



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MAR 02 2015

CERTIFIED MAIL 7009 1680 0000 7677 8961
RETURN RECEIPT REQUESTED

Mr. John J. Kim
Chief Legal Counsel
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Re: State Referral
Tradebe Treatment and Recycling, LLC
EPA I.D. No.: IND000646943

Dear Mr. Kim:

The U.S. Environmental Protection Agency received your referral pertaining to Tradebe Treatment and Recycling, LLC (Tradebe), in East Chicago, Indiana, dated December 18, 2013. This is to notify you that EPA has reviewed the file and is returning your referral.

The specifics of your referral were as follows. On February 11, 2013, AAA Galvanizing located in Peoria, Illinois, shipped 800 pounds of waste identified as zinc ammonium chloride filters to Tradebe for treatment and disposal. At the time of the shipment, AAA Galvanizing had identified the material as a non-hazardous waste. On February 16, 2013, Tradebe solidified the waste with other waste in its solid waste tanks. On February 18, 2013, Tradebe shipped 30,100 pounds of solidified waste, which contained the 800 pounds of zinc ammonium chloride filters, to the River Bend Prairie Landfill in Dolton, Illinois for disposal. The River Bend Prairie Landfill is not permitted for the disposal of hazardous waste.

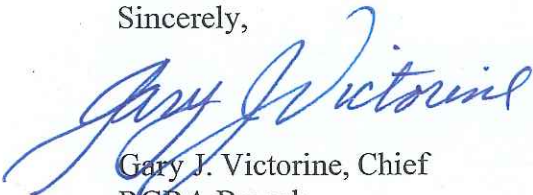
On February 27, 2013, Tradebe was notified by Bodine Environmental Services (Bodine), Bartonville, Illinois, a broker working on behalf of AAA Galvanizing, that a sample of the waste collected on January 31, 2013, revealed it possessed the characteristic of lead toxicity. Tradebe subsequently contacted the River Bend Prairie Landfill to advise them of the situation, who in turn contacted the Illinois Environmental Protection Agency. Tradebe maintained that at the time AAA Galvanizing shipped the waste to Tradebe, it had not been informed by AAA Galvanizing or Bodine that an updated waste determination was forthcoming.

On May 28, 2013, IEPA issued a Violation Notice to Tradebe alleging it violated Section 21(e) of the Illinois Environmental Protection Act; and sections 722.111 and 722.120(a) of the Illinois Administrative Code. Tradebe responded in writing to the alleged violations on July 23, 2013. IEPA met with Tradebe on August 29, 2013. On September 12, 2013, Tradebe submitted a "Compliance Commitment Agreement" to IEPA. IEPA rejected the CCA on October 10, 2013, and subsequently referred the matter to EPA for enforcement.

At this time, EPA has decided not to initiate its own enforcement action against Tradebe regarding this matter. EPA has informed the Indiana Department of Environmental Management (IDEM) of the matter, who has verbally agreed to address it through an enforcement action. IDEM is authorized to implement and enforce RCRA Subtitle C in the state of Indiana, and, therefore, is an appropriate agency to address this matter.

As requested, your original referral is enclosed. If you have any questions regarding this case, please contact Todd Brown, of my staff, at (312) 886-6091.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

(217) 782-5544
TDD: (217) 782-9143

CONFIDENTIAL
Attorney Work Product

7012 0470 0001 2973 9590

December 18, 2013

Attn: Mr. Gary Victorine
RCRA Branch Chief/ LR-8J
Land and Chemical Division
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Re: Tradebe Treatment and Recycling, LLC
9180890026—East Chicago, IN
ILD 000646943
DLC File No. 354-13

Dear Mr. Victorine:

Enclosed with this letter are documents compiled by the Illinois Environmental Protection Agency ("Illinois EPA") in support of an enforcement action involving Tradebe Treatment and Recycling, LLC ("Tradebe") and its failure to comply with provisions of the Resource Conservation and Recovery Act ("RCRA"). The Illinois EPA conducted a file review of its records regarding Tradebe on May 14, 2013. The review revealed apparent violations of the RCRA regulations for the management and disposal of hazardous waste.

Tradebe is a Delaware limited liability company based in Oak Brook, Illinois (Exhibits H and J). The Tradebe facility involved in this matter is a waste management, treatment and recycling business in East Chicago, Indiana. Tradebe is one of a number of affiliated companies held under the parent company, Tradebe GP (Exhibit I).

On February 11, 2013, AAA Galvanizing Peoria, Inc., sent a shipment of waste to Tradebe. The waste in question was listed on a hazardous waste manifest as filters and zinc ammonium chloride. The waste was also described as "non-RCRA & non-regulated by USEPA & USDOT." The waste had been sent to Tradebe for solidification and disposal. After treatment, it was sent to the River Bend Prairie Landfill in Dolton, IL, on February 18, 2013, for disposal (Exhibits A and D). The River Bend Prairie Landfill is not permitted to accept any hazardous waste.

Although the waste was handled as a non-hazardous waste, a waste analysis prepared for Bodine Environmental Services, the transporter of the waste from Peoria to Tradebe, showed that the waste was in fact hazardous (Exhibits A and D). The analysis showed elevated levels of Toxicity

Leaching Procedure ("TCLP") lead of 8.6 mg/L. Tradebe notified Land & Lakes Company, the owner and operator of the River Bend Prairie Landfill, of the error in the waste characterization on March 4, 2013. Land & Lakes Company then notified the Illinois EPA about the error in waste characterization. On April 11, 2013, the Illinois EPA conducted an inspection of the landfill to review the information about the waste shipment (Exhibit A). It also conducted a record review of its own files regarding Tradebe on May 14, 2013 (Exhibit B). Based upon the inspection and record review, the Illinois EPA determined that Tradebe had sent hazardous waste to the River Bend Prairie Landfill for disposal in violation of Sections 21(e), 21(f)(1), and 21(o)(7) of the Environmental Protection Act (415 ILCS 5/21 (2012)), and 35 Ill Adm. Code 703.121(a)(1) of the Pollution Control Board Rules.

A Violation Notice ("VN") letter regarding the violations was sent to Tradebe on May 23, 2013 (Exhibit C). Tradebe responded to the VN on July 23, 2013, providing a detailed explanation of the events surrounding its treatment of the waste and the shipment of it to River Bend Prairie Landfill (Exhibit D). A meeting was also held between Tradebe and the Illinois EPA on August 29, 2013, to discuss the apparent violations (Exhibit E). Tradebe provided a supplemental response to the VN on September 12, 2013, with its proposed Compliance Commitment Agreement ("CCA") (Exhibit F). The Illinois EPA informed Tradebe on October 10, 2013, that it had elected to not enter into a CCA regarding the violations (Exhibit G).

The Illinois EPA is referring this matter to your office for enforcement action, including the assessment of a civil penalty if one is determined to be appropriate. The Illinois EPA will defer the calculation of an appropriate penalty to your office. After you have reviewed this letter, if you agree to accept this referral, please advise me in writing. If you decide that you cannot accept this referral, please return the materials to me along with a statement of your reason for rejecting it. If you need any further information regarding the facility, or if you have any questions regarding this matter, please contact Mark V. Gurnik, the Assistant Counsel assigned to this case. He can be reached at 217-782-9825. Please forward copies of pleadings and correspondence relating to this matter to his attention.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Kim", with a large, sweeping flourish extending to the right.

John Kim
Chief Legal Counsel

JK/mvg
Enclosures

ENCLOSED DOCUMENTS

- A. April 11, 2013, Illinois EPA Inspection report of River Bend Prairie Landfill. (33 pages)
- B. May 14, 2013, Illinois EPA record review of Tradebe file. (3 pages)
- C. Violation Notice letter to Tradebe dated May 28, 2013. (6 pages)
- D. Letter from Tradebe responding to VN. (5 pages)
- E. Meeting Confirmation letter from the Illinois EPA. (3 pages)
- F. Letter from Tradebe with proposed CCA. (19 pages)
- G. Notice of Non-Issuance of CCA from Illinois EPA dated October 10, 2013. (5 pages)
- H. Corporation information regarding Tradebe. (2 pages)
- I. Dunn & Bradstreet report regarding Tradebe. (7 pages)
- J. Informational material from Tradebe web site. (10 pages)

Exhibit

A

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
811 Solid Waste Landfill Inspection Checklist

County: Cook LPC#: 0310690003 Region: 2 - Des Plaines
 Location/Site Name: Dolton/River Bend Prairie Landfill
 Date: 04/11/2013 Time: From 6:30 am To 10:25 am Previous Inspection Date: 02/08/2013
 Inspector(s): Calvin Harris Weather: Twilight, upper 20's
 No. of Photos Taken: # 3 Samples Taken: Yes # No ☒
 Interviewed: Brian Wozniak Facility Phone No.: (773) 264-8508

Permitted Owner Mailing Address

James Cowhey
 123 N. Northwest Highway
 Park Ridge, Illinois 60058

Permitted Operator Mailing Address

James Cowhey
 123 N. Northwest Highway
 Park Ridge, Illinois 60058

Chief Operator Mailing Address

Certified Operator Mailing Address

Brian Wozniak
 123 N. Northwest Highway
 Park Ridge, Illinois 60058

AUTHORIZATION:

Significant Modification Permit

Initial: 9/16/98

Latest 10/21/05

Exp Date

OPERATIONAL STATUS:

Operating ☒

Closed-Not Certified. ☐

Closed-Date Certified:

TYPE OF OPERATION:

Existing Landfills 814-Subpart C ☒

814-Subpart D ☒

New Landfills: 811-Putres./Chem. ☒

	SECTION	DESCRIPTION	VIOL
ILLINOIS ENVIRONMENTAL PROTECTION ACT REQUIREMENTS			
1.	9(a)	CAUSE, THREATEN OR ALLOW AIR POLLUTION IN ILLINOIS	<input type="checkbox"/>
2.	9(c)	CAUSE OR ALLOW OPEN BURNING	<input type="checkbox"/>
3.	12(a)	CAUSE, THREATEN OR ALLOW WATER POLLUTION IN ILLINOIS	<input type="checkbox"/>
4.	12(d)	CREATE A WATER POLLUTION HAZARD	<input type="checkbox"/>
5.	12(f)	CAUSE, THREATEN OR ALLOW DISCHARGE WITHOUT OR IN VIOLATION OF AN NPDES PERMIT	<input type="checkbox"/>
6.	21(a)	CAUSE OR ALLOW OPEN DUMPING	<input type="checkbox"/>
7.	21(d)	CONDUCT ANY WASTE-STORAGE, WASTE-TREATMENT, OR WASTE-DISPOSAL OPERATION:	
	(1)	Without a Permit or in Violation of Any Conditions of a Permit (See Permit Provisions)	<input type="checkbox"/>
	(2)	In Violation of Any Regulations or Standards Adopted by the Board	<input type="checkbox"/>
8.	21(e)	DISPOSE, TREAT, STORE, OR ABANDON ANY WASTE, OR TRANSPORT ANY WASTE INTO THE STATE AT/TO SITES NOT MEETING REQUIREMENTS OF ACT AND REGULATIONS	<input checked="" type="checkbox"/>
9.	21(f)(1)	CONDUCT ANY HAZARDOUS WASTE-STORAGE, TREATMENT OR DISPOSAL OPERATION WITHOUT A RCRA PERMIT.	<input checked="" type="checkbox"/>

10.	21(o)	CONDUCT A SANITARY LANDFILL OPERATION WHICH RESULTS IN ANY OF THE FOLLOWING CONDITIONS:	
	(1)	Refuse in Standing or Flowing Water	<input type="checkbox"/>
	(2)	Leachate Flows Entering Waters of the State	<input type="checkbox"/>
	(3)	Leachate Flows Exiting the Landfill Confines	<input type="checkbox"/>
	(4)	Open Burning of Refuse in Violation of Section 9 of the Act	<input type="checkbox"/>
	(5)	Uncovered Refuse Remaining From Any Previous Operating Day or at the Conclusion of Any Operating Day	<input type="checkbox"/>
	(6)	Failure to Provide Final Cover Within Time Limits	<input type="checkbox"/>
	(7)	Acceptance of Wastes Without Necessary Permits	<input checked="" type="checkbox"/>
	(8)	Scavenging as Defined by Board Regulations	<input type="checkbox"/>
	(9)	Deposition of Refuse in Any Unpermitted Portion of the Landfill	<input type="checkbox"/>
	(10)	Acceptance of Special Waste Without a Required Manifest	<input type="checkbox"/>
	(11)	Failure to Submit Reports Required by Permits or Board Regulations	<input type="checkbox"/>
	(12)	Failure to Collect and Contain Litter by the End of each Operating Day	<input type="checkbox"/>
	(13)	Failure to Submit Any Cost Estimate, Performance Bond or Other Security	<input type="checkbox"/>
11.	21(t)	CAUSE OR ALLOW A LATERAL EXPANSION OF A MUNICIPAL SOLID WASTE LANDFILL (MSWLF) UNIT WITHOUT A PERMIT MODIFICATION	<input type="checkbox"/>
12.	21.6(b)	ACCEPTANCE OF LIQUID USED OIL FOR FINAL DISPOSAL (EFFECTIVE JULY 1, 1996)	<input type="checkbox"/>
13.	22.01	FAILURE TO SUBMIT ANNUAL NONHAZARDOUS SPECIAL WASTE	<input type="checkbox"/>
14.	22.17	LANDFILL POST-CLOSURE CARE	
	(a)	Failure to Monitor Gas, Water, Settling	<input type="checkbox"/>
	(b)	Failure to Take Remedial Action	<input type="checkbox"/>
15.	22.22(c)	ACCEPTANCE OF LANDSCAPE WASTE FOR FINAL DISPOSAL	<input type="checkbox"/>
16.	22.23(f)(2)	CAUSE OR ALLOW THE DISPOSAL OF ANY LEAD-ACID BATTERY	<input type="checkbox"/>
17.	22.28(b)	ACCEPTANCE OF WHITE GOODS FOR FINAL DISPOSAL	<input type="checkbox"/>
18.	55(b)(1)	ACCEPTANCE OF ANY USED OR WASTE TIRE FOR FINAL DISPOSAL (UNLESS LANDFILL MEETS EXEMPTION OF 55(b)(1))	<input type="checkbox"/>
19.	55(k)	NO PERSON SHALL:	
	(1)	Cause or Allow Water to Accumulate in Used or Waste Tires	<input type="checkbox"/>
	(4)	Transport Used or Waste Tires in Violation of the Registration and Placarding Requirements	<input type="checkbox"/>
20.	56.1(a)	CAUSE OR ALLOW THE DISPOSAL OF ANY POTENTIALLY INFECTIOUS MEDICAL WASTE	<input type="checkbox"/>
ELECTRONIC PRODUCTS RECYCLING AND REUSE ACT REQUIREMENTS			
21.	95(a)	NO PERSON MAY KNOWINGLY CAUSE OR ALLOW THE MIXING OF A COVERED ELECTRONIC DEVICE (CED) OR OTHER LISTED DEVICE WITH MUNICIPAL WASTE THAT IS INTENDED FOR DISPOSAL AT A LANDFILL	<input type="checkbox"/>
22.	95(b)	NO PERSON MAY KNOWINGLY CAUSE OR ALLOW THE DISPOSAL OF A CED OR OTHER LISTED DEVICE IN A SANITARY LANDFILL	<input type="checkbox"/>

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23.	95(c)	NO PERSON MAY KNOWINGLY CAUSE OR ALLOW THE MIXING OF A CED OR OTHER LISTED DEVICE WITH WASTE THAT IS INTENDED FOR DISPOSAL BY BURNING OR INCINERATION	<input type="checkbox"/>
24.	95(d)	NO PERSON MAY KNOWINGLY CAUSE OR ALLOW THE BURNING OR INCINERATION OF A CED OR OTHER LISTED DEVICE	<input type="checkbox"/>
SOLID WASTE SITE OPERATOR CERTIFICATION LAW REQUIREMENTS			
25.	225 ILCS 230/1004	CAUSING OF ALLOWING OPERATION OF A LANDFILL WITHOUT PROPER COMPETENCY CERTIFICATE	<input type="checkbox"/>
35 ILLINOIS ADMINISTRATIVE CODE REQUIREMENTS SUBTITLE G			
PRIOR CONDUCT CERTIFICATION REQUIREMENTS			
22.	745.181	CHIEF OPERATOR REQUIREMENTS	<input type="checkbox"/>
23.	745.201	PRIOR CONDUCT CERTIFICATION PROHIBITIONS	<input type="checkbox"/>
SPECIAL WASTE HAULING REQUIREMENTS			
24.	809.301	REQUIREMENTS FOR DELIVERY OF SPECIAL WASTE TO HAULERS	<input type="checkbox"/>
25.	809.302(a)	REQUIREMENTS FOR ACCEPTANCE OF SPECIAL WASTE FROM HAULERS	<input type="checkbox"/>
26.	809.501	MANIFESTS, RECORDS, ACCESS TO RECORDS, REPORTING REQUIREMENTS AND FORMS	
	(a)	Delivery of Special Waste to Hauler	<input type="checkbox"/>
	(g)	Retention of Special Waste Manifests	<input type="checkbox"/>
NEW SOLID WASTE LANDFILL REQUIREMENTS			
	PART 811 SUBPART A	GENERAL STANDARDS FOR ALL LANDFILLS	
27.	811.103	SURFACE WATER DRAINAGE	
	(a)	Runoff from Disturbed Areas	<input type="checkbox"/>
	(b)	Diversion of Runoff from Undisturbed Areas	<input type="checkbox"/>
28.	811.104	SURVEY CONTROL	
	(a)	Boundaries Surveyed and Marked	<input type="checkbox"/>
	(b)	Stakes and Monuments Marked	<input type="checkbox"/>
	(c)	Stakes and Monuments Inspected	<input type="checkbox"/>
	(d)	Control Monument Established and Maintained	<input type="checkbox"/>
29.	811.105	COMPACTION	<input type="checkbox"/>
30.	811.106	DAILY COVER	
	(a)	Six Inches Soil	<input type="checkbox"/>
	(b)	Alternative Daily Cover	<input type="checkbox"/>
31.	811.107	OPERATING STANDARDS	
	(a)	Phasing of Operations	<input type="checkbox"/>

	(b)	Work Face Size and Slope	<input type="checkbox"/>
	(c)	Equipment	<input type="checkbox"/>
	(d)	Utilities	<input type="checkbox"/>
	(e)	Maintenance	<input type="checkbox"/>
	(f)	Open Burning	<input type="checkbox"/>
	(g)	Dust Control	<input type="checkbox"/>
	(h)	Noise Control	<input type="checkbox"/>
	(i)	Vector Control	<input type="checkbox"/>
	(j)	Fire Protection	<input type="checkbox"/>
	(k)	Litter Control	<input type="checkbox"/>
	(l)	Mud Tracking	<input type="checkbox"/>
	(m)	Liquid Restrictions for MSWLF Units	<input type="checkbox"/>
32.	811.108	SALVAGING	
	(a)	Salvaging Interferes with Operation	<input type="checkbox"/>
	(b)	Safe and Sanitary Manner	<input type="checkbox"/>
	(c)	Management of Salvagable Materials	<input type="checkbox"/>
33.	811.109	BOUNDARY CONTROL	
	(a)	Access Restricted	<input type="checkbox"/>
	(b)	Proper Sign Posted	<input type="checkbox"/>
34.	811.110	CLOSURE AND WRITTEN CLOSURE PLAN	
	(a)	Final Slopes and Contours	<input type="checkbox"/>
	(b)	Drainage Ways and Swales	<input type="checkbox"/>
	(c)	Final Configuration	<input type="checkbox"/>
	(d)	Written Closure Plan	<input type="checkbox"/>
	(e)	Initiation of Closure Activities at MSWLF Units	<input type="checkbox"/>
	(f)	Completion of Closure Activities at MSWLF Units	<input type="checkbox"/>
	(g)	Deed Notation for MSWLF Units	<input type="checkbox"/>
35.	811.111	POST-CLOSURE MAINTENANCE	
	(a)	Procedures After Receipt of Final Volume of Waste	<input type="checkbox"/>
	(b)	Remove All Equipment of Structures	<input type="checkbox"/>
	(c)	Maintenance and Inspection of the Final Cover and Vegetation	<input type="checkbox"/>
	(d)	Planned Uses of Property at MSWLF Units	<input type="checkbox"/>
36.	811.112	RECORDKEEPING REQUIREMENTS FOR MSWLF UNITS	
	(a)	Location Restriction Demonstration	<input type="checkbox"/>
	(b)	Load Checking Requirements	<input type="checkbox"/>
	(c)	Gas Monitoring Records	<input type="checkbox"/>
	(d)	MSWLF Liquid Restriction Records	<input type="checkbox"/>
	(e)	Groundwater Monitoring Program Requirements	<input type="checkbox"/>
	(f)	Closure and Post Closure Care Requirements	<input type="checkbox"/>
	(g)	Cost Estimates and Financial Assurance Requirements	<input type="checkbox"/>
	PART 811 SUBPART C	PUTRESCIBLE AND CHEMICAL WASTE LANDFILLS	

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37.	811.302	FACILITY LOCATION	
	(c)	Site Screening (Does Not Apply To Part 814-Subpart D Sites)	<input type="checkbox"/>
38.	811.309	LEACHATE TREATMENT AND DISPOSAL SYSTEM	
	(a)	General Requirements	<input type="checkbox"/>
	(c)	Standards for On-Site Treatment and Pretreatment	<input type="checkbox"/>
	(d)	Standards for Leachate Storage System	<input type="checkbox"/>
	(e)	Standards for Discharge to Off-Site Treatment	<input type="checkbox"/>
	(f)	Standards for Leachate Recycling Systems	<input type="checkbox"/>
	(g)	Standards for Leachate Monitoring Systems	<input type="checkbox"/>
39.	811.310	LANDFILL GAS MONITORING (FOR SITES ACCEPTING PUTRESCIBLE WASTE)	
	(b)	Location and Design of Gas Monitoring Wells	<input type="checkbox"/>
	(c)	Monitoring Frequency for Landfill Gas	<input type="checkbox"/>
	(d)	Monitoring Parameters	<input type="checkbox"/>
40.	811.311	LANDFILL GAS MANAGEMENT SYSTEM (FOR CHEMICAL AND PUTRESCIBLE LANDFILLS)	
	(a)	Conditions for Installation of Gas Management System	<input type="checkbox"/>
	(b)	Notification and Implementation Requirements	<input type="checkbox"/>
	(c)	Standards for Gas Venting	<input type="checkbox"/>
	(d)	Standards for Gas Collection	<input type="checkbox"/>
41.	811.312	LANDFILL GAS PROCESS AND DISPOSAL SYSTEM	
	(c)	No Unpermitted Gas Discharge	<input type="checkbox"/>
	(d)	Gas Flow Rate Measurements into Treatment or Combustion Device	<input type="checkbox"/>
	(e)	Standards for Gas Flares	<input type="checkbox"/>
	(f)	Standards for On-Site Combustion of Landfill Gas Using Devices Other Than Flares	<input type="checkbox"/>
	(g)	Gas Transported Off-Site	<input type="checkbox"/>
42.	811.313	INTERMEDIATE COVER	
	(a)	Requirements for the Application for Intermediate Cover	<input type="checkbox"/>
	(b)	Runoff and Infiltration Control	<input type="checkbox"/>
	(c)	Maintenance of Intermediate Cover	<input type="checkbox"/>
43.	811.314	FINAL COVER SYSTEM (DOES NOT APPLY TO PART 814 SITES THAT HAVE CLOSED, COVERED AND VEGETATED PRIOR TO SEPTEMBER 18, 1990)	
	(a)	General Requirements	<input type="checkbox"/>
	(b)	Standards for Low Permeability Layer	<input type="checkbox"/>
	(c)	Standards for Final Protective Layer	<input type="checkbox"/>
44.	811.316	PLUGGING AND SEALING OF DRILL HOLES	
45.	811.321	WASTE PLACEMENT	
	(a)	Phasing of Operations	<input type="checkbox"/>
	(b)	Initial Waste Placement	<input type="checkbox"/>
46.	811.322	FINAL SLOPE AND STABILIZATION	
	(a)	Grade Capable of Supporting Vegetation and Minimizing Erosion	<input type="checkbox"/>
	(b)	Slopes Required to Drain	<input type="checkbox"/>

	(c)	Vegetation	<input type="checkbox"/>
	(d)	Structures Built over the Unit	<input type="checkbox"/>
47.	811.323	LOAD CHECKING PROGRAM	
	(a)	Load Checking Program Implemented	<input type="checkbox"/>
	(b)	Load Checking Program for PCB's at MSWLF Units	<input type="checkbox"/>
	(c)	Load Checking Program Components	<input type="checkbox"/>
	(d)	Handling Regulated Hazardous Wastes	<input type="checkbox"/>
	PART 811 SUBPART D	MANAGEMENT OF SPECIAL WASTES AT LANDFILLS	
48.	811.402	NOTICE TO GENERATORS AND TRANSPORTERS	<input type="checkbox"/>
49.	811.403	SPECIAL WASTE MANIFESTS REQUIREMENTS	<input type="checkbox"/>
50.	811.404	IDENTIFICATION RECORD	
	(a)	Special Waste Profile Identification Sheet	<input type="checkbox"/>
	(b)	Special Waste Recertification	<input type="checkbox"/>
51.	811.405	RECORDKEEPING REQUIREMENTS	<input type="checkbox"/>
52.	811.406	PROCEDURES FOR EXCLUDING REGULATED HAZARDOUS WASTES	<input type="checkbox"/>
	PART 811 SUBPART G	FINANCIAL ASSURANCE	
53.	811.700	COMPLY WITH FINANCIAL ASSURANCE REQUIREMENTS OF PART 811, SUBPART G	<input type="checkbox"/>
54.	811.701	UPGRADING FINANCIAL ASSURANCE	<input type="checkbox"/>
55.	811.704	CLOSURE AND POST-CLOSURE CARE COST ESTIMATES	<input type="checkbox"/>
56.	811.705	REVISION OF COST ESTIMATE	<input type="checkbox"/>
		SOLID WASTE FEE SYSTEM REQUIREMENTS	
57.	Part 858 Subpart B	MAINTAINED, RETAINED & SUBMITTED DAILY & MONTHLY SOLID WASTE RECORDS AND QUARTERLY SOLID WASTE SUMMARIES WHERE INCOMING WASTE IS WEIGHED (LIST SPECIFIC SECTION	<input type="checkbox"/>
58.	Part 858 Subpart C	MAINTAINED, RETAINED & SUBMITTED DAILY & MONTHLY SOLID WASTE RECORDS AND QUARTERLY SOLID WASTE SUMMARIES WHERE INCOMING WASTE IS NOT WEIGHED (LIST SPECIFIC	<input type="checkbox"/>
		OTHER REQUIREMENTS	
59.	OTHER:	APPARENT VIOLATION OF: (<input type="checkbox"/>) PCB; (<input type="checkbox"/>) CIRCUIT COURT CASE NUMBER: ORDER ENTERED ON:	<input type="checkbox"/>
60.	703.121(a)(1)	No person shall conduct any hazardous waste storage, hazardous waste treatment of hazardous waste disposal operation without a RCRA permit for the HWM (hazardous waste management) facility.	<input checked="" type="checkbox"/>
			<input type="checkbox"/>
			<input type="checkbox"/>

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			<input type="checkbox"/>
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			<input type="checkbox"/>
			<input type="checkbox"/>

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1. [Illinois] Environmental Protection Act: 415 ILCS 5/1 et seq.; and The Electronic Products Recycling and Reuse Act: 415 ILCS 150/5 et seq.
2. Illinois Pollution Control Board: 35 Ill. Adm. Code, Subtitle G.
3. Statutory and regulatory references herein are provided for convenience only and should not be construed as legal conclusions of the Agency or as limiting the Agency's statutory or regulatory powers. Requirements of some statutes and regulations cited are in summary format. Full text of requirements can be found in references listed in 1. and 2. above.
4. The provisions of subsection (p) of Section 21, subsection (k) of Section 55 of the [Illinois] Environmental Protection Act shall be enforceable either by administrative citation under Section 31.1 of that Act or by complaint under Section 31 of that Act. Violation of the Electronic Products Recycling and Reuse Act shall be enforceable by administrative citation under Section 20(k) of that Act, or referral to the Attorney General, pursuant to Section 20(a) of that Act.
5. This inspection was conducted in accordance with Sections 4(c) and 4(d) of the [Illinois] Environmental Protection Act: 415 ILCS 5/4(c) and (d) ; and Section 20(a) of the Electronic Products Recycling and Reuse Act: 415 ILCS 150/20(a)
6. Items marked with an "NE" were not evaluated at the time of this inspection.

[illegible]

LPC #: 0310690003

Inspection Date: 04/11/2013

0310690003-Cook County
Dolton/River Bend Prairie Landfill
FOS
April 23, 2013
Calvin Harris
Page 1

NARRATIVE
Prepared by Calvin Harris

On April 11, 2013, I conducted a solid waste inspection at River Bend Prairie Landfill. The purpose of this inspection was to determine the facility's compliance status with the Environmental Protection ACT, 35 Ill. Adm. Code Regulations, and its permit No. 1996-314-LF, Modification 57. I interviewed Site Engineer Brian Wozniak, who also accompanied me during the site tour.

According to records provided, 8,140 cubic yards of municipal solid waste arrived on site from April 4, 2013 to April 11, 2013. In addition, approximately 70 cubic yards of certified non-special waste, 500 cubic yards of special waste, 104 cubic yards of asbestos, 1,652 cubic yards of brick and asphalt, as well as, 120 cubic yards of silica arrived on site. Incoming loads are checked at the gate entrance of the facility and checked again when placed at the working face. If non-acceptable waste is spotted at these checkpoints, the hauler is ordered to remove this waste from the site. Records of incoming loads placed at the working face were reviewed and appeared in compliance with permit requirements. The working face was located in the Lateral Expansion section of the site; a tarp was being utilized as daily cover. Records pertaining to alternant daily cover were reviewed and appeared in good order. River Bend Prairie Landfill generated 659,687 gallons of leachate during March 2013. The leachate is discharged to MWRDGC.

Two manifests were selected at random to ensure that the site was in compliance with the waste approval protocols outlined in the facility's permit. These manifests were used to transport non-hazardous special waste to River Bend Prairie Landfill from off-site sources. Based on various screening and testing parameters, waste profiles are established, which enables the site to receive certain non-hazardous special waste for disposal. In addition, wastes that are certified non-special are subject to the same rigorous assessment as special wastes. The information from the manifests compared favorably with related waste profiles. Work related to excavating a trench toward installing a gas control and collection system was ongoing during the inspection. Mr. Wozniak assured me that any excavated debris is covered or buried prior to the end of the day. This activity was initiated to as a measure against system failure.

On March 5, 2013, Mr. Woniak forwarded me an electronic notification that hazardous waste had arrived from Tradebe Environmental Services, LLC (Tradebe) on February 12, 2013; (See Attachment 1). This waste originated from AAA Galvanizing Peoria, Inc., in Peoria, Illinois and was transported to Tradebe by Bodine Services of Peoria, LLC. According to Agency records, T AAA Galvanizing Peoria, Inc., is owned by AZZ, Inc., based in Ft. Worth, Texas. The waste consisted of cotton filters, dirt, polyester and zinc chloride and assumed non-hazardous, according to a waste profile established on behalf of the generator (See Attachment 2). The waste, which was shipped using Manifest Tracking Number 009674731, is described on the 2nd line of section 9b as Non-RCRA & Non-Regulated by USEPA and USDOT (Filters, Zinc Ammonium Chloride); 800 pounds within 4 containers are also described in this manifest (See Attachment 3). The waste was shipped to Tradebe for solidification and sent to River Bend

0310690003-Cook County
Dolton/River Bend Prairie Landfill
FOS
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Page 2

Prairie Landfill for deposition; Homewood Disposal provided the transportation to this site (See Attachment 4). The waste determination lab report supplied by the generator's consultant, Bodine Environmental Services-Peoria (Bodine), indicates that the Zinc Ammonium Chloride, Iron wastestream has a 8.6 mg/L (ppm) TCLP concentration for lead; the sample used for analysis is identified as P18604-13-B in the Chain of Custody Record. PDC Laboratories, Inc., located in Peoria, Illinois conducted the analysis; the date of report is February 11, 2013 (See Attachment 5). (Note: page 7 of 7 of this analytical report is Chain of Custody Record corresponding to Attachment 6.) Mr. Wozniak and I spoke to Aaron Kinkelaar, who serves as Environmental Project Manager for Bodine. He informed us that waste determination analysis was required by corporate personnel at AAA Galvanizing Peoria, Inc., based on policy. According to the Chain of Custody Record used for shipping P18604-13-B and other samples, these items were secured on January 31, 2013 and shipped to PDC Laboratories, Inc., on January 30, 2013. I cautioned Mr. Kinkelaar regarding this and other discrepancies identified on the Chain of Custody Record. (See Attachment 6). The Uniform Hazardous Waste Manifest used to ship the waste from AZZ Galvanizing to Tradebe was signed by the generator on January 11, 2013, but the transporter signed this document on February 11, 2013. In a letter dated March 4, 2013, Bodine Environmental Services-Peoria notified Tradebe Environmental Services, LLC of the manifest discrepancy toward rectifying the error (See Attachment 7).

During the inspection, Mr. Wozniak showed the area of the landfill where the hazardous waste was disposed. Bricks were placed on top of the impacted area and appeared undisturbed. He mentioned that a Topcon GPS unit was used to provide the location of the disposed waste. Mr. Wozniak mentioned that this unit has an accuracy of (+/-) 0.1 feet. The GPS readings correspond to N 1813039, E 1186740; N 1813039, E 1186755 (West to East) and N1813024, E 1186740, N 1813024, 1186755 (West to East) (See Attachment 8). On March 7, 2013, Mr. Wozniak showed me the impacted area and provided records indicating the type and quantity of waste that was received on February 18, 2013. This waste was co-mingled and disposed with other waste received during the same day, which amounted to 355.75 tons or 1087 cubic yards (See Attachment 9). This waste was placed in the southeastern section of the Existing Landfill.

The following alleged violations were cited:

Pursuant to Section 21(e) of the Illinois Environmental Protection Act, no person shall dispose, treat, store or abandon any waste, or transport any waste into this State for disposal, treatment, storage or abandonment, except at a site or facility which meets the requirements of this Act and of regulations and standards thereunder.

Violation of Section 21(e) of the Illinois Environmental Protection Act is alleged for the following reason: **Hazardous waste was disposed at River Bend Prairie Landfill, which does not meet the requirements of the Act and regulations for a hazardous waste landfill.**

0310690003-Cook County
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Pursuant to Section 21(f)(1) of the Illinois Environmental Protection Act, no person shall conduct any hazardous waste-storage, hazardous waste treatment or hazardous waste disposal operation without a RCRA permit for the site issued by the Agency under subsection (d) of

Section 39 of this Act, or in violation of any condition imposed by such permit, including periodic reports and full access to adequate records and the inspection of facilities, as may be necessary to ensure compliance with this Act and with regulations and standards adopted thereunder.

Violation of Section 21(f)(1) of the Illinois Environmental Protection Act is alleged for the following reason: **Hazardous waste was disposed at River Bend Prairie Landfill without a RCRA permit.**

Pursuant to Section 21(o)(7) of the Illinois Environmental Protection Act, no person shall conduct a sanitary landfill operation, which results is required to have a permit under subsection (d) of this Section, in a manner which results in the acceptance of waste without necessary permits.

Violation of Section 21(o)(7) of the Illinois Environmental Protection Act is alleged for the following reason: **Hazardous waste was disposed at River Bend Prairie Landfill without a RCRA permit.**

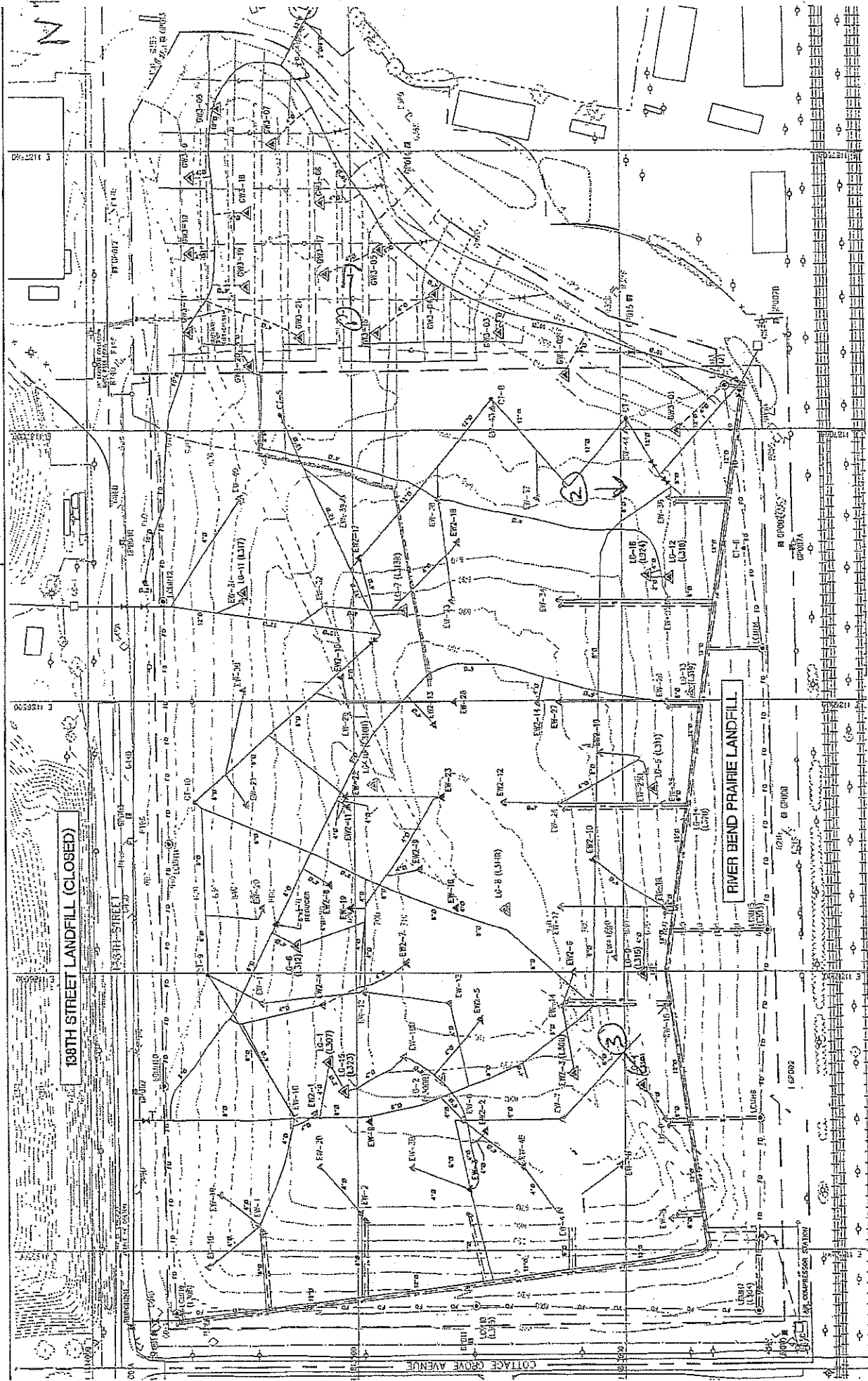
Pursuant to 35 Ill. Adm. Code 703.121(a)(1), no person shall conduct any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation without a RCRA permit for the HWM (hazardous waste management) facility.

Violation of 35 Ill. Adm. Code 703.121(a)(1) is alleged for the following reason: **River Bend Prairie Landfill disposed hazardous waste without a RCRA permit issued by the Illinois EPA.**

4-11-13

0310690003-C - County
Don Hon / River Bend Prairie CF

07 Photo taken - direction
not to scale.



LEGEND



DIGITAL PHOTOGRAPHS File Names: 0310690003~04112013-[Exp. #].jpg
0310690003~04112013-[Exp. #].jpg



Date: 04/11/2013
Time: 06:30 AM-10:25 AM
Direction: East
Photo by: C. Harris
Exposure #: 001
Comments: View of
previous day's daily
cover.



Date: 04/11/2013
Time: 06:30 AM-10:25 AM
Direction: South
Photo by: C. Harris
Exposure #: 002
Comments: View
indicating area of
hazardous waste
disposal.



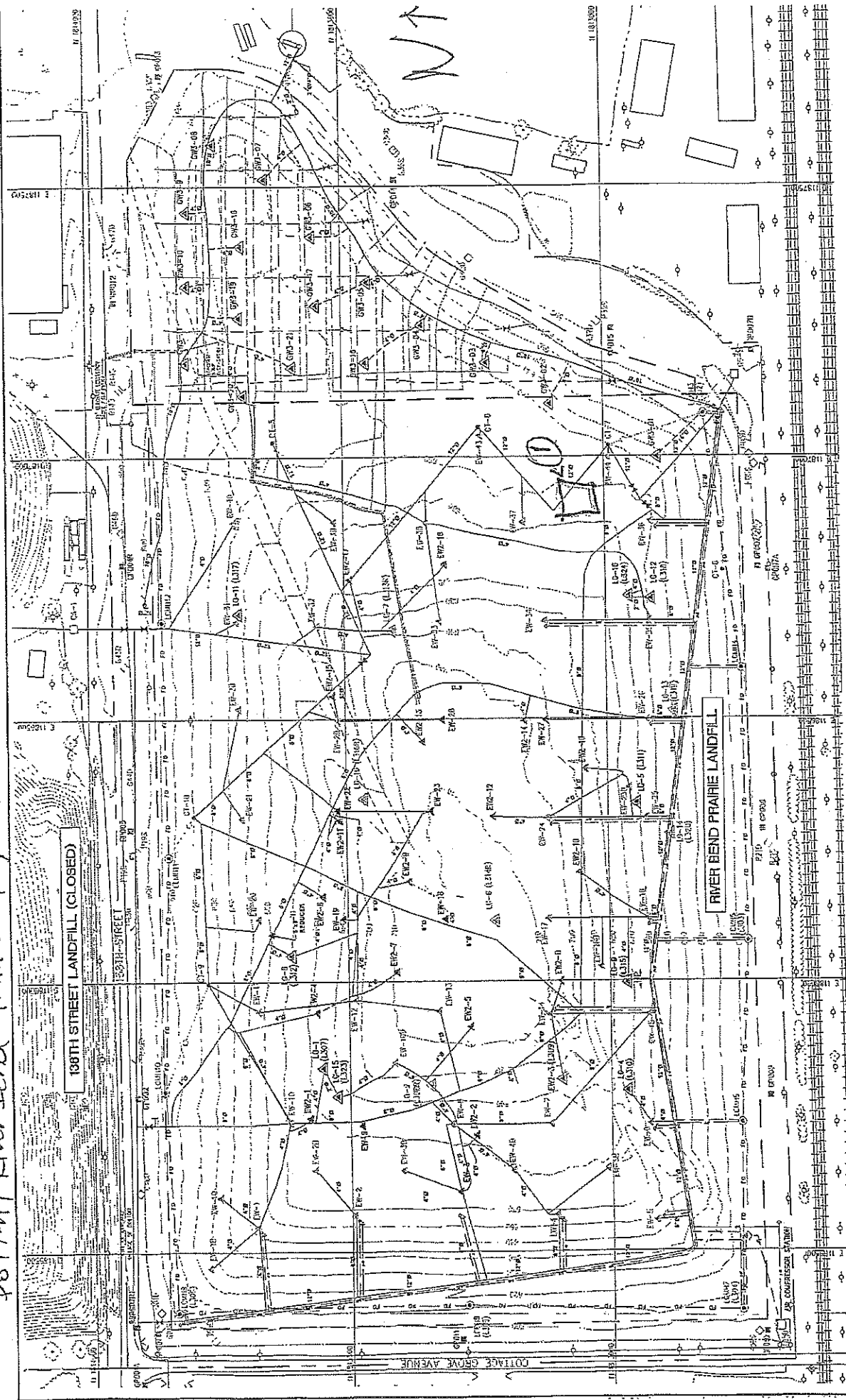
DIGITAL PHOTOGRAPHS File Names: 0310690003~04112013-[Exp. #].jpg



Date: 04/11/2013
Time: 06:30 AM-10:25
AM
Direction: Southwest
Photo by: C. Harris
Exposure #: 003
Comments: View of
work toward
installing gas
control and
collection system.

NO PHOTOGRAPH

031069003-Cook County ♂ photo taken, direction 3-7-13
 Doltan / River Bend Prairie CF; Not to scale FOS

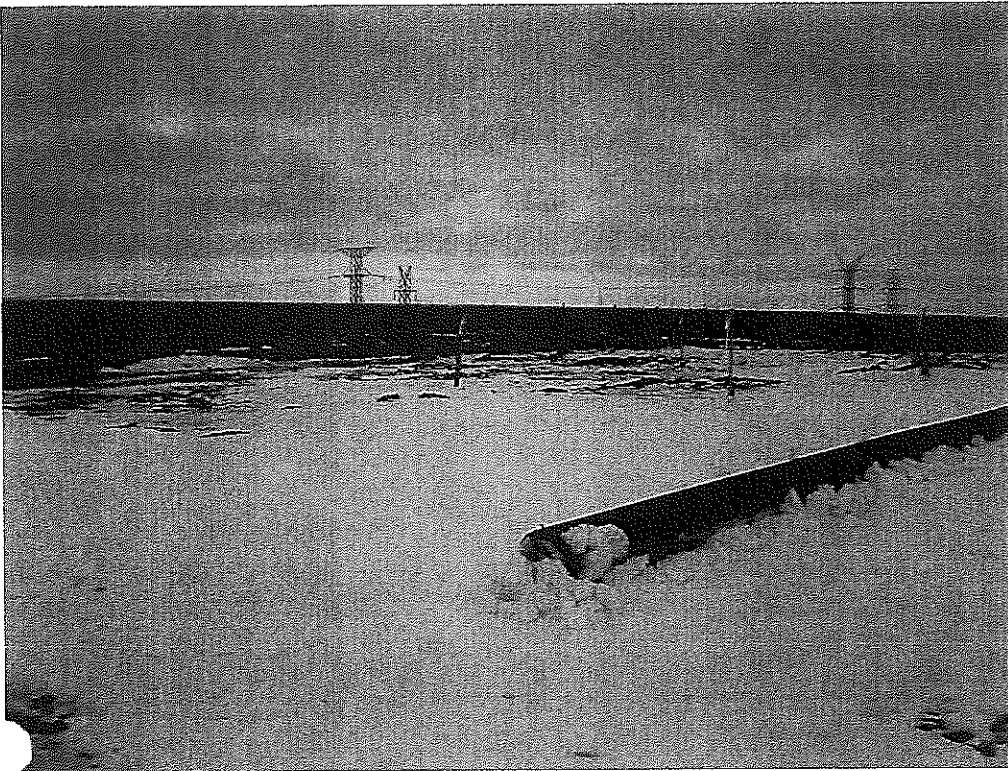


LEGEND

--- WASTE BOUNDARY
 --- 570 - 580 4" HIDE PIPE
 □ REDUCER
 --- AIR CONDITIONER DRAIN



DIGITAL PHOTOGRAPHS File Names: 0310690003~03072013-[Exp. #].jpg



Date: 03/07/2013
Time: 09:53 AM-11:14
AM
Direction: Southeast
Photo by: C. Harris
Exposure #: 001
Comments: View
indicating area of
hazardous waste
disposal.

NO PHOTOGRAPH

(Attachment 1)



Tuesday, March 5, 2013

Via e-mail

Mr. Calvin Harris
Illinois Environmental Protection Agency
Bureau of Land
1021 N Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

Re: River Bend Prairie #031069003
Non conforming waste

Dear Mr. Harris,

Please be informed that Land & Lakes Company was informed on March 4, 2013 by its customer, Tradebe Environmental Services, LLC (Tradebe) that Tradebe sent a roll-off box to River Bend Prairie on February 18, 2013 that was represented to be non-hazardous, non RCRA regulated special waste, however, a portion of the materials in that load is now reported to have a lead content of 8.6 PPM.

In compliance with 35 IAC 811.323 (d), this notification is being promptly made to the Agency, Tradebe, (the generator of the wastes delivered to Land & Lakes), and Homewood Disposal (the person responsible for the shipping the waste to the landfill). In addition, the area where the wastes were deposited has been cordoned off from public access by the usual site access restrictions in place at River Bend Prairie.

As of this time, Land & Lakes has received a verbal report from Mr. Robert Vaughn, Environmental Compliance Manager of Tradebe that its customer delivered four drums of material weighing a total of 800 pounds on February 12, 2013. The material then was shredded, solidified and processed by Tradebe on February 16, 2013. Tradebe then combined that material with other waste which was loaded into a roll-off box and hauled to River Bend Prairie by Homewood Disposal on February 18, 2013. The entry ticket for the load indicates the load weighed 30,400 lbs. Tradebe informed Land & Lakes that it used data concerning the processing times of its tanks and the load ticket times to determine which truck carried the material.

Tradebe informed Land & Lakes that it would provide the original manifest it received from its customer, a copy of the outbound manifest to Land & Lakes after processing, the scale house ticket, and the cover letter and analytical data from its customer.

Sincerely,

Brian J. Wozniak
Landfill Manager

cc: Robert Vaughn, Tradebe
Tom Agema, Homewood Disposal

(Attachment 2)



TRADEBE
Environmental Services, LLC

TRADEBE TREATMENT AND RECYCLING, LLC

GENERATOR WASTE STREAM PROFILE SHEET

PROFILE #: 1418SP

Process Code: NS

Fax or email completed profile sheet to : TTR Fax:219-397-6411 UIS Fax:203-238-6744

usa.approvals@tradebe.com

A. GENERATOR INFORMATION:

Generator #: 8386549
 Generator Name: AZZ GALVANIZING
 Generator Address: 6718 W PLANK RD.
 City: PEORIA State: IL Zip: 61604
 Contact Name:
 Generator Phone:
 Generator Fax:
 Generator Email:
 Generator USEPA/Federal ID#: ILR000140194
 If no ID number is the Generator a "Conditionally Exempt Small Quantity Generator?"
 Generator SIC (or NAIC) Code:
 Please check if generator has "No Canada Disposal" policy
 Please check if generator has "No Landfill" policy

BILLING INFORMATION:

Customer #: 8340444
 Customer Name: BODINE SERVICES OF PEORIA
 Customer Address: 4203 CONSTITUTION ROAD
 City: BARTONVILLE State: IL Zip: 61607
 Contact Name: AARON KINKELAAR
 Customer Phone: 308-633-9999
 Customer Fax: 398-633-9914
 Customer Email: akinkelaar@bodineservices.com
 Sales Rep: CARROLL, PAT CSR: Tamra Perez
 Yes X No
 Generator State ID# (if applicable):
 Yes X No
 Yes X No

B. WASTE STREAM INFORMATION:

Name of the Waste: FLUX FILTERS
 Original Process Generating Waste: USED FILTERS
 Is this waste exempt from RCRA regulation? Yes X No
 If "Yes", please explain cite regulation on continuation. (Eg: HHW, CESQG)
 Current method of disposal:
 Is this waste from a CERCLA cleanup site? Yes X No
 Waste determination was made by: Testing Generator Knowledge MSDS Sample Other
 (Attach analytical, MSDS, or other supporting documentation used for waste determination)
 Does any Waste have any of the following characteristics (if yes check all that apply) Yes X No
 Oxidizer Dioxin or Suspect Water Reactive Air Reactive Organic Peroxide
 Hexachrome Infectious Waste Radioactive Chelating Agent Lachrymator
 Explosive Shock Sensitive Polymerizer Pyrophoric Inhalation Hazard, Zone None

C. GENERAL CHARACTERISTICS:

Color: DARK	Physical State @ 70F	Phases	BTU/lb	pH
Odor: None	% Liquid Aerosol	X Single Layer	X <3000 (Ex water)	NA 10.0 - 12.5
X Mild	X % Solid Powder	Double Layer	3,000 - 5,000	<2 (Acid) >12.5 (Base)
Strong	% Sludge	>2 Layers	5,000 - 10,000	2.0 - 4.0
	% Debris Other	0 How many?	> 10,000 (Ex coil)	X 4.0 - 10.0
Liquid Flashpoint: <73F 73 to 95 F 100 to 139 F 140 to 200 F X >200 F None	Boiling Point: 0.00 Specific Gravity: 8.00 Total Halogens: 0.00% Total Organic Carbon (TOC): 0.00 Viscosity: 0.00			

D. CHEMICAL COMPOSITION: Total of Maximum concentration must be > or = to 100%.

Constituents	Min%	Max %
COTTON FILTERS	70.00	80.00
DIRT	1.00	5.00
POLYESTER	10.00	20.00
ZINC AMMONIUM CHLORIDE	1.00	5.00

Does the Waste contain any of the following?

Metal Pieces: Yes X No If Yes Describe Metal:
 Nitrocellulose: Yes X No Metal Powder or Flake: Yes X No Sharps: Yes X No
 Isocyanates: Yes X No Asbestos: (if yes, must be double bagged and wetted) Yes X No
 Reactive Cyanide: (if yes, indicate level in ppm) Yes X No Range of reactive cyanide
 Reactive sulfide: (if yes, indicate level in ppm) Yes X No Range of reactive sulfide
 PCBs: X None 0-49 ppm 50-499 ppm 500+ ppm
 Does the Waste contain Benzene? Yes X No

2812	2813	2815	2819	2821	2822	2823	2824	2833	2834	2835	2836	2841	2842	2843	2844	2851	2851
2865	2869	2873	2874	2875	2876	2879	2891	2892	2893	2896	2899	2911	2999	3312	4953	4959	9511

If waste contains benzene and falls under one of the above SIC codes, Tradebe's benzene NESHA form is required for each ship

E. OTHER WASTE STREAM INFORMATION:

Waste Stream Approval Notes:

Is this waste a "USED OIL" per 40CFR PART 279?

If "Yes", does the total halogen content exceed 1,000 ppm?

If "Yes", can you identify the "Chlorinated Constituent" present in the oil?

If "Yes", can you rebut the presumption that this material is a "Hazardous Waste"?

Is the Waste subject to RCRA Subpart CC controls? (40 CFR 265 SUBPART CC)

Does the Waste contain any Class I or Class II ozone-depleting substances?

Does waste contain EPCRA 313 chemicals identified in 40 CFR 372.65?

If "Yes" identify those chemicals in Appendix II of this form.

Does this waste contain any "Chemicals of Interest" listed in 6 CFR Part 27 Appendix A (Department of Homeland Security)?

If "yes" please list in Appendix II of this form.

Yes	X	No
Yes	X	No
Yes	X	No
Yes	X	No
Yes	X	No
Yes	X	No
Yes	X	No
Yes	X	No

F. R.C.R.A. CHARACTERIZATION:

Is this a USEPA "Hazardous Waste" per 40CFR 261.3?

Is this a "Universal Waste" per 40CFR part 273?

Proper waste codes: NONE

Does the waste contain organic UHCs above treatment standards levels? (40 CFR 258.48, 268.7)

If "Yes" identify those chemicals in Appendix I - Underlying Hazardous Constituents

Is this a state regulated waste? If YES: (Please list all applicable waste codes)

Yes	X	No
Yes	X	No
Yes	X	No
Yes	X	No

G. SHIPPING VOLUME & FREQUENCY:

One time shipment?

Drums size 55

Is waste a combination package (e.g. Drum with inner containers or skid with cases of consumer products)

Shipping Frequency: Number of Units: 0 Per Quarter

Yes	X	No
Yes	X	No

H. DOT SHIPPING INFORMATION

Is this a U.S. Department of Transportation (USDOT) Hazardous Material?

Yes X No

Proper Shipping Name per 49 CFR 172.101 Hazardous Materials Table:

Hazard Class or Division:

UN/NA #

Packing Group:

Technical descriptors if required:

RQ if required:

DOT Special Permit that may apply (include copy of permit):

Inhalation Hazard Zone: None

I. GENERATOR CERTIFICATION:

I agree by affixing my authorized signature that I hereby certify that the above and attached description is complete and accurate and that no omissions of characteristics, composition or properties exist and that all known or suspected hazards have been disclosed. I also certify that each sample provided to Tradebe is representative of the waste material described above and give Tradebe permission and consent to make amendments and corrections and that I am an authorized agent of the Generator.

Name (print): A. KINKELAAR

Signature: YES

Title: EPM

Date: 10/16/2012

INTERNAL USE ONLY: Please indicate which Tradebe Facility(s) are being utilized for this profile

☐ TTR ILC, East Chicago, IL

☐ TTR Millington, TN

☒ Bridgeport United Recycling Bridgeport, CT

☐ United Oil Recovery, Inc Meriden, CT

☐ ECC Sloughon, MA

☐ Zecca Northboro, MA

☐ United Oil Recovery, Inc Newington, NH

☐ Norlite Corp Colton, NY

009674731 JJK

115582

(Attachment 3)

3-7-13

8386549/8340404

Form Approved OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number TIR000148194	2. Page 1 of 1	3. Emergency Response Phone 309-633-9999	4. Manifest Tracking Number 009674731 JJK		
5. Generator's Name and Mailing Address AKS GALVANIZING 6718 W PLANK RD PEORIA, IL 61604		Generator's Site Address (if different than mailing address)					
Generator's Phone: 309 697-0101							
6. Transporter 1 Company Name MODINE SERVICES OF PEORIA LLC (STW #5183)		U.S. EPA ID Number TIR000124412					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address TRADEWIND TREATMENT AND RECYCLING, LLC 4343 KENNEDY AVENUE EAST CHICAGO, IN 46312 Facility's Phone: 800-388-7242		U.S. EPA ID Number IND000646943					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. UN/NA	13. Waste Codes
	X	1. UN1760, WASTE CORROSIVE LIQUIDS, H.O.S. (OIL, SULFURIC ACID), 3, PGII, RQ (D002)	11	DF	605	G	D002
		2. NON RCRA & NON REGULATED BY USEPA & USDOT (FILTERS, ZINC AMMONIUM CHLORIDE)	4	DF	800	P	
		3. NON RCRA & NON REGULATED BY USEPA & USDOT (ZINC AMMONIUM CHLORIDE, IRON)	3	DF	600	P	
	X	4. UN1760, WASTE CORROSIVE LIQUIDS, H.O.S. (SULFURIC ACID, WATER), 3, PGIII, RQ (D002)	4	DF	330	P	D002
14. Special Handling Instructions and Additional Information 1) ERG #154, TIR #140BSP 2) RCRA EXEMPT, TIR #141BSP 3) RCRA EXEMPT, TIR #142BSP 4) ERG #154, TIR #143BSP MODINE PROJECT #218636-13 EMERGENCY RESPONSE CONTACT: MODINE SERVICES OF PEORIA LLC 309-6744							
15. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.22(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name LONNIE A. GIBSON JR		Signature [Signature]		Month Day Year 11/11/13			
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit Date leaving U.S.:					
17. Transporter Acknowledgment of Receipt of Materials		Signature [Signature]		Month Day Year 12/11/13			
Transporter 1 Printed/Typed Name Jason Faulkner		Signature [Signature]		Month Day Year 12/11/13			
Transporter 2 Printed/Typed Name		Signature		Month Day Year			
18. Discrepancy							
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection							
Manifest Reference Number: U.S. EPA ID Number							
18b. Alternate Facility (or Generator)							
Facility's Phone: Month Day Year							
18c. Signature of Alternate Facility (or Generator)							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. H141 2. NA 3. NA 4.							
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a							
Printed/Typed Name Knsy Bettenhausen		Signature [Signature]		Month Day Year 02/03/13			

Attachment 4

3-7-13

Form Approved. OMB No. 2050-0039

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number 1 N D 9 7 0 8 4 8 9 4 3	2. Page 1 of 1	3. Emergency Response Phone (800) 368-7742	4. Manifest Tracking Number 011059799 JJK	
5. Generator's Name and Mailing Address WASTE TREATMENT AND RECYCLING, LLC. 4343 KENNEDY AVENUE EAST CHICAGO, IN 46312		Generator's Site Address (if different than mailing address) (312) 597-3951				
Generator's Phone:		6. Transporter 1 Company Name HOMERWOOD DISPOSAL			U.S. EPA ID Number N/A ONLY	
7. Transporter 2 Company Name					U.S. EPA ID Number	
8. Designated Facility Name and Site Address RIVER BEND PRAIRIE 801 E. 134TH STREET DOLTON, IL 60419					U.S. EPA ID Number (773) 264-8508	
Facility's Phone:						
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt/Vol
	1	1. HAZ HAZARDOUS, HAZ WASTE, REGULATED (HAZARDOUS SUBST)	1	C M	39/103	NONE
	2					
	3					
	4					
13. Waste Codes						
14. Special Handling Instructions and Additional Information D. ERG/A 1544 BOX # TRUCK # ERG - TRADESE						
15. GENERATOR/SIGNER'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 49 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Signer's Printed/Typed Name Lisa J. G. G. G. G.		Signature Lisa J. G. G. G.		Month Day Year 12/18/13		
INT'L	16. International Shipments: <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S.		Port of entry/exit: Date leaving U.S.:			
	Transporter signature (for exports only):					
TRANSPORTER	17. Transporter Acknowledgment of Receipt of Materials					
	Transporter 1 Printed/Typed Name JUAN CARLOS	Signature Juan Carlos	Month Day Year 12/18/13			
DESIGNATED FACILITY	Transporter 2 Printed/Typed Name		Month Day Year			
18. Discrepancy						
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
Manifest Reference Number: U.S. EPA ID Number						
18b. Alternate Facility (or Generator)						
Facility's Phone:						
18c. Signature of Alternate Facility (or Generator)						
Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
1. 2. 3. 4.						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a						
Printed/Typed Name		Signature		Month Day Year		

WEIGHT TICKET

70553

3-7-13

Attachment 4

13:20

2-18-2013

DRIVER:

HOMERWOOD

CUSTOMER:

RIVER B

10080 1D STEERING
30680 1D DRIVE
31840 1D TANDEM

72600 1D GROSS

TYPICAL CONTAINER WTS.

55-GALLON TIGHT HEAD 35 LBS.
55-GALLON OPEN HEAD 45 LBS
85-GALLON OVERPACK
5-GALLON PLASTIC 3 LBS.
5-GALLON OPEN TOP METAL 4 LBS
5-GALLON TIGHT HEAD 5 LBS.
25-GALLON PLASTIC
10-GALLON OPEN TOP METAL

GROSS WEIGHT

30100

VEHICLE TARE WEIGHT

CONTAINER TARE WEIGHT

CALCULATION:

NUMBER OF CONTAINERS

WEIGHT PER EMPTY CONTAINER

CONTAINER TA

FINAL MATERIAL NET WEIGHT

TRUCK # 872

TRAILER # 260

SCALE MASTER:

①



(Attachment 5)

PDC Laboratories, Inc.

P.O. Box 9071 • Peoria, IL 61612-9071

(309) 692-9686 • (800) 752-6651 • FAX (309) 692-9689



Bodine Environmental Services - Peoria
4203 Constitution Dr
Bartonville, IL 61607
Attn: Aaron Kinkelaar

Date Received: 01/31/13 15:41
Report Date: 02/11/13
Customer #: 253361
PO#: P18604-13

Laboratory Results

Sample No: 3013745-01

Collect Date: 01/31/13 10:30

Matrix: Solid Grab

Sample Description: P18604-13-A

Parameters	Result	Qual	Prep Date	Analysis Date	Analyst	Method
<u>General Chemistry - PIA</u>						
pH	1.29 pH Units	H	02/06/13 09:00	02/06/13 09:00	TCH	SW 9045C
Solids - total solids (TS)	74 %		02/05/13 11:23	02/05/13 11:54	REM	SM 2540G 10Ed
<u>TCLP Metals - PIA</u>						
Arsenic	< 0.10 mg/L		02/05/13 05:30	02/07/13 09:56	KMC	SW 6020
Barium	< 5.0 mg/L		02/05/13 05:30	02/07/13 09:56	KMC	SW 6020
Cadmium	0.10 mg/L		02/05/13 05:30	02/07/13 09:56	KMC	SW 6020
Chromium	< 0.020 mg/L		02/05/13 05:30	02/07/13 09:56	KMC	SW 6020
Final pH	0.03		02/04/13 12:00	02/05/13 07:30	TAT	SW 1311
Lead	3.1 mg/L		02/05/13 05:30	02/07/13 09:56	KMC	SW 6020
Mercury	< 0.0050 mg/L		02/05/13 05:30	02/07/13 09:56	KMC	SW 6020
Nickel	0.32 mg/L		02/05/13 05:30	02/07/13 09:56	KMC	SW 6020
Selenium	< 0.025 mg/L		02/05/13 05:30	02/07/13 09:56	KMC	SW 6020
Silver	< 0.050 mg/L		02/05/13 05:30	02/07/13 09:56	KMC	SW 6020
Zinc	280 mg/L		02/05/13 05:30	02/07/13 09:56	KMC	SW 6020

Sample No: 3013745-02

Collect Date: 01/31/13 10:35

Matrix: Solid Grab

Sample Description: P18604-13-B

Parameters	Result	Qual	Prep Date	Analysis Date	Analyst	Method
<u>General Chemistry - PIA</u>						
pH	1.55 pH Units	H	02/06/13 09:00	02/06/13 09:00	TCH	SW 9045C
Solids - total solids (TS)	71 %		02/06/13 15:02	02/06/13 15:14	REM	SM 2540G 10Ed
<u>TCLP Metals - PIA</u>						
Arsenic	< 0.040 mg/L		02/07/13 05:30	02/07/13 09:51	KMC	SW 6020
Barium	< 2.0 mg/L		02/07/13 05:30	02/07/13 09:51	KMC	SW 6020
Cadmium	0.57 mg/L		02/07/13 05:30	02/07/13 09:51	KMC	SW 6020
Chromium	4.6 mg/L		02/07/13 05:30	02/07/13 09:51	KMC	SW 6020
Final pH	4.11		02/06/13 12:00	02/07/13 08:09	TAT	SW 1311

3013745



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Bodine Environmental Services - Peoria
4203 Constitution Dr
Bartonville, IL 61607
Attn: Aaron Kinkelaar

Date Received: 01/31/13 15:41
Report Date: 02/11/13
Customer #: 253361
PO#: P18604-13

Laboratory Results

Sample No: 3013745-02

Collect Date: 01/31/13 10:35
Matrix: Solid Grab

Sample Description: P18604-13-B

Parameters	Result	Qual	Prep Date	Analysis Date	Analyst	Method
<u>TCLP Metals - PIA</u>						
Lead	3.6 mg/L		02/07/13 05:30	02/07/13 09:51	KMC	SW 6020
Mercury	< 0.0020 mg/L		02/07/13 05:30	02/07/13 09:51	KMC	SW 6020
Nickel	2.6 mg/L		02/07/13 05:30	02/07/13 09:51	KMC	SW 6020
Selenium	0.099 mg/L		02/07/13 05:30	02/07/13 09:51	KMC	SW 6020
Silver	< 0.020 mg/L		02/07/13 05:30	02/07/13 09:51	KMC	SW 6020
Zinc	1700 mg/L		02/07/13 05:30	02/07/13 10:11	KMC	SW 6020

Sample No: 3013745-03

Collect Date: 01/31/13 10:40
Matrix: Solid Grab

Sample Description: P18604-13-C

Parameters	Result	Qual	Prep Date	Analysis Date	Analyst	Method
<u>General Chemistry - PIA</u>						
pH	4.43 pH Units	H	02/05/13 09:00	02/05/13 09:00	TCH	SW 9045C
Solids - total solids (TS)	88 %		02/05/13 11:23	02/05/13 11:54	REM	SM 2540G-18Ed
<u>TCLP Metals - PIA</u>						
Arsenic	0.057 mg/L		02/05/13 05:30	02/05/13 09:51	KMC	SW 6020
Barium	< 2.0 mg/L		02/05/13 05:30	02/05/13 09:51	KMC	SW 6020
Cadmium	0.057 mg/L		02/05/13 05:30	02/05/13 09:51	KMC	SW 6020
Chromium	0.14 mg/L		02/05/13 05:30	02/05/13 09:51	KMC	SW 6020
Final pH	4.73		02/04/13 12:00	02/05/13 07:30	TAT	SW 1311
Lead	0.038 mg/L		02/05/13 05:30	02/05/13 09:51	KMC	SW 6020
Mercury	< 0.0020 mg/L		02/05/13 05:30	02/05/13 09:51	KMC	SW 6020
Nickel	0.25 mg/L		02/05/13 05:30	02/05/13 09:51	KMC	SW 6020
Selenium	0.13 mg/L		02/05/13 05:30	02/05/13 09:51	KMC	SW 6020
Silver	< 0.020 mg/L		02/05/13 05:30	02/05/13 09:51	KMC	SW 6020
Zinc	2700 mg/L		02/05/13 05:30	02/05/13 12:43	KMC	SW 6020

3013745



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Bodine Environmental Services - Peoria
4203 Constitution Dr
Bartonville, IL 61607
Attn: Aaron Kinkelaar

Date Received: 01/31/13 15:41
Report Date: 02/11/13
Customer #: 253361
PO#: P18604-13

Laboratory Results

Sample No: 3013745-04

Collect Date: 01/31/13 10:45

Matrix: Solid Grab

Sample Description: P18604-13-D

Parameters	Result	Qual	Prep Date	Analysis Date	Analyst	Method
<u>General Chemistry - PIA</u>						
pH	4.43 pH Units	H	02/05/13 09:00	02/05/13 09:00	TCH	SW 9045C
Solids - total solids (TS)	40 %		02/05/13 11:23	02/05/13 11:54	REM	SM 2540G 18Ed
<u>TCLP Metals - PIA</u>						
Arsenic	< 0.040 mg/L		02/05/13 05:30	02/05/13 09:56	KMC	SW 6020
Barium	< 2.0 mg/L		02/05/13 05:30	02/05/13 09:56	KMC	SW 6020
Cadmium	< 0.0040 mg/L		02/05/13 05:30	02/05/13 09:56	KMC	SW 6020
Chromium	0.046 mg/L		02/05/13 05:30	02/05/13 09:56	KMC	SW 6020
Final pH	4.94		02/04/13 12:00	02/05/13 07:30	TAT	SW 1311
Lead	0.15 mg/L		02/05/13 05:30	02/05/13 09:56	KMC	SW 6020
Mercury	< 0.0020 mg/L		02/05/13 05:30	02/05/13 09:56	KMC	SW 6020
Nickel	< 0.010 mg/L		02/05/13 05:30	02/05/13 09:56	KMC	SW 6020
Selenium	< 0.010 mg/L		02/05/13 05:30	02/05/13 09:56	KMC	SW 6020
Silver	< 0.020 mg/L		02/05/13 05:30	02/05/13 09:56	KMC	SW 6020
Zinc	5.6 mg/L		02/05/13 05:30	02/05/13 12:46	KMC	SW 6020

Sample No: 3013745-05

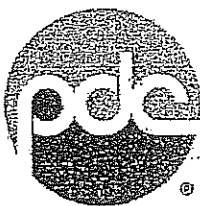
Collect Date: 01/31/13 10:50

Matrix: Waste Water Grab

Sample Description: P18604-13-E

Parameters	Result	Qual	Prep Date	Analysis Date	Analyst	Method
<u>General Chemistry - PIA</u>						
pH	7.65 pH Units	H	02/05/13 15:39	02/05/13 15:40	TCH	SM 4500-HB 18Ed - EPA 150.1 - SW 9040B
<u>TCLP Metals - PIA</u>						
Arsenic	< 0.040 mg/L		02/05/13 05:30	02/05/13 10:00	KMC	SW 6020
Barium	< 2.0 mg/L		02/05/13 05:30	02/05/13 10:00	KMC	SW 6020
Cadmium	< 0.0040 mg/L		02/05/13 05:30	02/05/13 10:00	KMC	SW 6020
Chromium	0.049 mg/L		02/05/13 05:30	02/05/13 10:00	KMC	SW 6020
Final pH	0.00		02/04/13 12:00	02/05/13 07:30	TAT	SW 1311

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Bodine Environmental Services - Peoria
4203 Constitution Dr
Bartonville, IL 61607
Attn: Aaron Kinkelaar

Date Received: 01/31/13 15:41
Report Date: 02/11/13
Customer #: 253361
PO#: P16604-13

Laboratory Results

Sample No: 3013745-05

Collect Date: 01/31/13 10:50

Matrix: Waste Water Grab

Sample Description: P16604-13-E

Parameters	Result	Qual	Prep Date	Analysis Date	Analyst	Method
<u>TCLP Metals - PIA</u>						
Lead	<0.020 mg/L		02/05/13 05:30	02/05/13 10:00	KMC	SW 6020
Mercury	<0.0020 mg/L		02/05/13 05:30	02/05/13 10:00	KMC	SW 6020
Nickel	0.032 mg/L		02/05/13 05:30	02/05/13 10:00	KMC	SW 6020
Selenium	<0.010 mg/L		02/05/13 05:30	02/05/13 10:00	KMC	SW 6020
Silver	<0.020 mg/L		02/05/13 05:30	02/05/13 10:00	KMC	SW 6020
Zinc	<2.0 mg/L		02/05/13 05:30	02/05/13 12:59	KMC	SW 6020

Sample No: 3013745-06

Collect Date: 01/31/13 10:55

Matrix: Solid Grab

Sample Description: P16604-13-F

Parameters	Result	Qual	Prep Date	Analysis Date	Analyst	Method
<u>General Chemistry - PIA</u>						
pH	1.77 pH Units	H	02/06/13 09:00	02/06/13 09:00	TCH	SW 9045C
Solids - total solids (TS)	92 %		02/05/13 11:23	02/05/13 11:54	REM	SM 2540G 18Ed
<u>TCLP Metals - PIA</u>						
Arsenic	0.17 mg/L		02/05/13 05:30	02/05/13 10:09	KMC	SW 6020
Barium	<2.0 mg/L		02/05/13 05:30	02/05/13 10:09	KMC	SW 6020
Cadmium	1.1 mg/L		02/05/13 05:30	02/05/13 10:09	KMC	SW 6020
Chromium	5.9 mg/L		02/05/13 05:30	02/05/13 10:09	KMC	SW 6020
Final pH	4.17		02/04/13 12:00	02/05/13 07:30	TAT	SW 1311
Lead	9.0 mg/L		02/05/13 05:30	02/05/13 10:09	KMC	SW 6020
Mercury	<0.0020 mg/L		02/05/13 05:30	02/05/13 10:09	KMC	SW 6020
Nickel	6.8 mg/L		02/05/13 05:30	02/05/13 10:09	KMC	SW 6020
Selenium	0.55 mg/L		02/05/13 05:30	02/05/13 10:09	KMC	SW 6020
Silver	<0.020 mg/L		02/05/13 05:30	02/05/13 10:09	KMC	SW 6020
Zinc	7900 mg/L		02/05/13 05:30	02/05/13 12:49	KMC	SW 6020

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Bodine Environmental Services - Peoria
4203 Constitution Dr
Bartonville, IL 61607
Attn: Aaron Kinkelaar

Date Received: 01/31/13 15:41

Report Date: 02/11/13

Customer #: 253361

PO#: P18604-13

Laboratory Results

Sample No: 3013745-07

Collect Date: 01/31/13 11:00

Matrix: Non-Aqueous Liquid Grab

Sample Description: P18604-13-G

Parameters	Result	Qual	Prep Date	Analysis Date	Analyst	Method
<u>General Chemistry - PIA</u>						
pH	1.34 pH Units	H	02/05/13 09:00	02/05/13 09:00	TCH	SW 9045C
Solids - total solids (TS)	52 %		02/05/13 11:23	02/05/13 11:54	REM	SM 2540G 18E8
<u>TCLP Metals - PIA</u>						
Arsenic	1.7 mg/L		02/05/13 05:30	02/05/13 10:14	KMC	SW 6020
Barium	< 10 mg/L		02/05/13 05:30	02/05/13 14:31	KMC	SW 6020
Cadmium	4.4 mg/L		02/05/13 05:30	02/05/13 10:14	KMC	SW 6020
Chromium	390 mg/L		02/05/13 05:30	02/05/13 13:55	KMC	SW 6020
Final pH	0.00		02/04/13 12:00	02/05/13 07:30	TAT	SW 1311
Lead	58 mg/L		02/05/13 05:30	02/05/13 13:55	KMC	SW 6020
Mercury	< 0.010 mg/L		02/05/13 05:30	02/05/13 13:55	KMC	SW 6020
Nickel	95 mg/L		02/05/13 05:30	02/05/13 13:55	KMC	SW 6020
Selenium	5.3 mg/L		02/05/13 05:30	02/05/13 10:14	KMC	SW 6020
Silver	< 0.020 mg/L		02/05/13 05:30	02/05/13 10:14	KMC	SW 6020
Zinc	97000 mg/L		02/05/13 05:30	02/05/13 12:52	KMC	SW 6020

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Bodine Environmental Services - Peoria
4203 Constitution Dr
Bartonville, IL 61607
Attn: Aaron Kinkelaar

Date Received: 01/31/13 15:41
Report Date: 02/11/13
Customer #: 253361
PO#: P18604-13

Laboratory Results

Notes

This report shall not be reproduced, except in full, without the written approval of the laboratory.

PDC Laboratories participates in the following accreditation/certification and proficiency programs at the following locations. Endorsement by Federal or State Governments or their agencies is not implied.

PIA PDC Laboratories - Peoria, IL

TNI Accreditation for Drinking Water, Wastewater, Hazardous and Solid Wastes Fields of Testing through IL EPA Lab No. 100230
Illinois Department of Public Health Bacteriological Analysis in Drinking Water Approved Laboratory Registry No. 17553
Drinking Water Certifications: Kansas (E-10336); Missouri (870); Wisconsin (998284430); Indiana (C-IL-040); Iowa (240).
Wastewater Certifications: Arkansas (88-0677); Wisconsin (998284430); Iowa (240); Kansas (E-10335)
Hazardous/Solid Waste Certifications: Arkansas (88-0677); Wisconsin (998284430); Iowa (240); Kansas (E-10335)
UST Certification: Iowa (240)

SPM PDC Laboratories - Springfield, MO
EPA DMR-QA Program

STL PDC Laboratories - St. Louis, MO

TNI Accreditation for Wastewater, Hazardous and Solid Wastes Fields of Testing through KS EPA Lab No. E-10389

H Test performed after the expiration of the appropriate regulatory/advisory maximum allowable hold time.

Certified by: Lisa Grant, Project Manager

Page 7 of 7

(Attachment 7)

3-7-13

BODINE

SERVICES OF PEORIA LLC

Industrial Plant Maintenance
Tank Removal/Cleaning
Wet/Dry Vacuuming
24 Hour Service
Video Inspection
Waste Transportation

High Pressure Water Blasting
Municipal Sewer Cleaning
Environmental Audits
Spill Response
Site Remediation
Hi-Rail Vacuuming

March 4, 2013

Tradebe Environmental Services, LLC
Attn: Robert Vaughn
4343 Kennedy Avenue
East Chicago, IL 46312

Dear Mr. Vaughn:


RE: Request for Chain of Custody
Sample Identification
Manifest #009674731JJK

A full set of the analysis including the results of all samples have been attached to this letter. The original Chain of Custody is the last page in the analysis.

I have attached a full copy of the analytical for the samples that I had tested as part of Bodine project #P18604-13. Samples are arranged from P18604-13-A to P18604-13-G. Sample number P18604-13-B is the sample for profile #141BSP. On the Chain of Custody under section #2, it is the second sample. Bodine does not use the profile number on the analysis due to client confidentiality as well as wanting to attain unbiased results.

Manifest #009674731JJK has been noticed to have the incorrect pick up date in the Generator's/Officer's Section of the manifest. Bodine would like to note the Transporter's Date is the correct date of pick up. Bodine is seeking a note of correction from the generator. For further consideration of this matter, Bodine also has records of the hours worked on this project that have been documented in payroll, timesheets and driving logs.

Respectfully Submitted,
Bodine Services of Peoria LLC


Aaron Kinkelaar, CHMM, CBS
Environmental Project Manager

Enclosures (2):

Laboratory Results with Chain of Custody
Manifest Copy

4/11/13

(Attachment 8)

RE: Tradebe load disposal area

RE: Tradebe load disposal area

Brian Wozniak

Sent: Tuesday, March 05, 2013 10:32 AM

To: Mary Margaret Cowhey

4-11-13

Working face = impacted area

MM,

We survey the limits of the working face/asbestos area every day. That day we were here:

DATE	LOCATION		EASTING		ELEVATION (msl)	
	From	To	From	To	From	To
02/18/2013	1,813,039	1,813,024	1,186,740	1,186,755	680	689

Let me know if the formatting in the email makes sense. Basically, I have the northings, eastings and elevations for that day's working face. No additional lifts were placed on this area and we are not operating anywhere near this section of the landfill. It will be easy to mark out.

Let me know if you need anything else. Thank you.

Brian J. Wozniak, P.E.

Operations Manager - Landfill

Land and Lakes Company

1220 East 138th Street

Chicago, Illinois 60827

708-277-5563 Cell

773-568-0814 Office / Fax

BWozniak@land-and-lakes.com

<http://www.land-and-lakes.com/>

N 1813039
E 1186740

N 1813039
E 1186755

2
1

N 1813024
E 1186740

N 1813024
E 1186755

From: Mary Margaret Cowhey

Sent: Tuesday, March 05, 2013 10:09 AM

To: Brian Wozniak

Subject: Tradebe load disposal area

Where do you estimate the tradebe load went? How large an area would it have been spread over? How deep is it now? Is it feasible to mark this area off with stakes and keep it separate until we get this resolved?

MM

Summary of Ticket Volume by Material Type

3/5/2013

RBP Special Waste

2/18/2013 thru 2/18/2013

sludge cover 1 foot application

(Attachment 9)

		RBP Special Waste	Total
Total	Qty (All UOM)	99.58	99.58
	Actual Tons	98.58	98.58
	Actual Yards	164.00	164.00
<i>same</i> Asbestos Multi Load Ticket Non Exempt	Qty (All UOM)	1.00	1.00
	Actual Tons	0.00	0.00
	Actual Yards	2.00	2.00
Asbestos Non Exempt	Qty (All UOM)	3.48	3.48
	Actual Tons	3.48	3.48
	Actual Yards	2.00	2.00
GCNS Non Exempt Tons	Qty (All UOM)	25.80	25.80
	Actual Tons	25.80	25.80
	Actual Yards	35.00	35.00
Special Waste Tons Non Exempt	Qty (All UOM)	69.30	69.30
	Actual Tons	69.30	69.30
	Actual Yards	125.00	125.00

Report Filters:

Date Range Start >= 2/18/2013

Date Range End <= 2/18/2013

Division = RBP Special Waste

NOTE: This report only includes charges that are material type charges. No standard charges are included.

Exhibit

B

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

BUREAU OF LAND / FIELD OPERATIONS SECTION

RCRA INSPECTION REPORT

GENERAL FACILITY INFORMATION

USEPA ID #:	ILD000646943	BOL ID #:	9180890026
Facility Name:	Tradebe Treatment and Recycling, LLC	Phone #:	(219) 397-3951
Location	4343 Kennedy Avenue	County:	Lake
City:	East Chicago	State:	Indiana
		Zip Code:	46312
Region:	Des Plaines	Inspection Date:	5/14/13
		Time:	N/A
Weather:	N/A		

TYPE OF FACILITY

Notified As:	Regulated As:
--------------	---------------

TYPE OF INSPECTION

CEI:	<input type="checkbox"/>	CME/O&M:	<input type="checkbox"/>	CSI:	<input type="checkbox"/>	NRR:	<input type="checkbox"/>	CCI:	<input type="checkbox"/>	PIF:	<input type="checkbox"/>	CVI:	<input type="checkbox"/>	CSE:	<input type="checkbox"/>	CAO:	<input type="checkbox"/>
FUI to:	Other: Record Review																

NOTIFICATION INFORMATION (EPA 8700-12)

Notification Date:	(initial)	(subsequent)
--------------------	-----------	--------------

PART A PERMIT INFORMATION (EPA 3510-3 OR EPA 8700-23)

Part A Date:	Amended:	Withdrawn:
--------------	----------	------------

PART B PERMIT INFORMATION

(Check one if applicable) Application Submitted?	<input type="checkbox"/>	Permit Issued?	<input type="checkbox"/>	Date:
--	--------------------------	----------------	--------------------------	-------

ACTIVE ENFORCEMENT

Date facility referred to:	USEPA:	IAGO:	County State's Attorney:
----------------------------	--------	-------	--------------------------

ACTIVE ENFORCEMENT ORDERS

CACO:	CAFO:	Federal Court Order:
Consent Decree:	IPCB Order:	State Court Order:

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	On Part B?	Activity ever done?	Closed?	Being done during inspection?	Exempt per 35 IAC Sec:	On Annual Report:		
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

OWNER

OPERATOR

Name:	Tradebe Environmental Services, LLC	Name:	Tradebe Treatment and Recycling, LLC
Address:	1301 West 22 nd St., Suite 500	Address:	4343 Kennedy Avenue
City:	Oak brook	City:	East Chicago
State:	Illinois	State:	Indiana
Zip Code:	60523	Zip Code:	46312
Phone #:		Phone #:	(219) 397-3951

PERSON(S) INTERVIEWED

TITLE

PHONE

See Memo dated 10-14-13		

INSPECTION PARTICIPANTS

AGENCY/BUREAU

PHONE

Calvin Harris *	IEPA/BOL	847/294-4080

*Report prepared by this person.

SUMMARY OF APPARENT VIOLATIONS

AREA	SECTION	X
	722.120(a)	<input checked="" type="checkbox"/>
	722.111	<input checked="" type="checkbox"/>
	21(e)	<input checked="" type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

AREA	SECTION	X
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

AREA	SECTION	X
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

X = CONTINUING VIOLATIONS



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

MEMORANDUM

DATE: October 21, 2013

TO: Division File

FROM: Calvin Harris, BOL/FOS *CH*

SUBJECT: 9180890023—Peoria County
East Chicago/Tradebe Treatment and Recycling, LLC
FOS

On May 14, 2013, I conducted a record review regarding a load of hazardous waste that arrived at River Bend Prairie Landfill on February 18, 2013. This waste, which originated from AAA Galvanizing Peoria, Inc., had a TCLP lead concentration of 8.6 ppm. It was shipped to Tradebe Environmental Services, LLC (Tradebe) in East Chicago, Indiana on February 11, 2013 and underwent treatment as a non-hazardous waste. On March 5, 2013, the Illinois EPA received notification from Land and Lakes, owner of River Bend Prairie Landfill, that the hazardous waste had been shipped to the landfill. This notice was sent from Brian Wozniak, who acted as Site Engineer for the landfill at the time of the incident. River Bend Prairie Landfill was inspected on April 11, 2013 and an investigation concerning the deleterious load ensued.

The record review resulted in the issuance of Violation Notice, L-2013-01115 to Tradebe Environmental Services, LLC, who failed to conduct a hazardous waste determination and was responsible for shipping hazardous waste to a landfill unpermitted to receive and dispose such waste. The violations cited include: 35 Ill. Adm. Code 722.120(a), 35 Ill. Adm. Code 722.111 and Section 21(e) of the Environmental Protection Act.

cc: Region File

Exhibit

C



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

847-294-4000

847/294-4018 (Fax)

MAY 28 2013

Tradebe Treatment and Recycling, LLC
Attn: Tita La Grimas
4343 Kennedy Avenue
East Chicago, Indiana 46312

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7009 2820 0004 1412 6181

Re: Violation Notice, L-2013-01115
9180890026 - East Chicago, IN.
Tradebe Treatment and Recycling, LLC
Compliance File

Dear Ms. La Grimas:

This constitutes a Violation Notice pursuant to Section 31(a)(1) of the Illinois Environmental Protection Act, 415 ILCS 5/31(a)(1), and is based on an record review completed on May 14, 2013, by representatives of the Illinois Environmental Protection Agency ("Illinois EPA").

The Illinois EPA hereby provides notice of alleged violations of environmental laws, regulations, or permits as set forth in the attachment to this notice. The attachment includes an explanation of the activities that the Illinois EPA believes may resolve the specified alleged violations, including an estimate of a reasonable time period to complete the necessary activities. Due to the nature and seriousness of the alleged violations, please be advised that resolution of the violations may also require the involvement of a prosecutorial authority for purposes that may include, among others, the imposition of statutory penalties.

A written response, which may include a request for a meeting with representatives of the Illinois EPA, must be submitted via certified mail to the Illinois EPA within 45 days of receipt of this notice. If a meeting is requested, it shall be held within 60 days of receipt of this notice. The response must include information in rebuttal, explanation, or justification of each alleged violation and a statement indicating whether or not you wish to enter into a Compliance Commitment Agreement ("CCA") pursuant to Section 31(a) of the Act. If you wish to enter into a CCA, the written response must also include proposed terms for the CCA that includes dates for achieving each commitment and a may include a statement that compliance has been achieved for some or all of the alleged violations. The proposed terms of the CCA should contain sufficient detail and must include steps to be taken to achieve compliance and the necessary dates by which compliance will be achieved.

Page 2

The Illinois EPA will review the proposed terms for a CCA provided by you and, within 30 days of receipt, will respond with either a proposed CCA or a notice that no CCA will be issued by the Illinois EPA. If the Illinois EPA sends a proposed CCA, you must respond in writing by either agreeing to and signing the proposed CCA or by notifying the Illinois EPA that you reject the terms of the proposed CCA.

If a timely written response to this Violation Notice L-2013-01115 is not provided, it shall be considered a waiver of the opportunity to respond and meet, and the Illinois EPA may proceed with referral to a prosecutorial authority.

Written communications should be directed to:

Illinois EPA – Bureau of Land
Attn: Charles T. Grigalauski, Regional Manager
9511 West Harrison Street, 3rd Floor
DesPlaines, Illinois 60016

Please include the Violation Number L-2013-01115 and the Site Identification Number 9180890026 on all written communications.

The complete requirements of the Illinois Environmental Protection Act and any Illinois Pollution Control Board regulations cited herein or in the inspection report can be viewed at:


<http://www.ipcb.state.il.us/SLR/TheEnvironmentalProtectionAct.asp>

and

<http://www.ipcb.state.il.us/SLR/IPCBandIEPAEnvironmentalRegulations-Title35.asp>

If you have questions regarding this matter, please contact Calvin Harris at 847/294-4080.

Sincerely,



Charles T. Grigalauski, Regional Manager
Field Operations Section
Bureau of Land

CTG:CH:kp:La Grimas.ltr.1

Attachment

ATTACHMENT A

Pursuant to Section 21(e) of the [Illinois] Environmental Protection Act [415 ILCS 5/21(e)], no person shall dispose, treat, store or abandon any waste, or transport any waste into this State for disposal, treatment, storage or abandonment, except at a site or facility which meets the requirements of this Act and of regulations and standards thereunder.

A violation of Section 21(e) of the [Illinois] Environmental Protection Act [415 ILCS 5/21(e)] is alleged for the following reason: **Hazardous waste was disposed at a site, which does not meet the requirements of the Act and regulations for a hazardous waste landfill.**

Pursuant to 35 Ill. Adm. Code 722.111, a person that generates a solid waste, as defined in 35 Ill. Adm. Code 721.102, must determine if that waste is a hazardous waste using the following method:

- a) The person should first determine if the waste is excluded from regulation under 35 Ill. Adm. Code 721.104.
- b) The person should then determine if the waste is listed as a hazardous waste in Subpart D of 35 Ill. Adm. Code 721.
- c) For purposes of compliance with 35 Ill. Adm. Code 728, or if the waste is not listed as a hazardous waste in Subpart D of 35 Ill. Adm. Code 721, the generator must then determine whether the waste is identified in Subpart C of 35 Ill. Adm. Code 721 by either of the following methods:
 - 1) Testing the waste according to the methods set forth in Subpart C of 35 Ill. Adm. Code 721, or according to an equivalent method approved by the Board under 35 Ill. Adm. Code 720.121; or
 - 2) Applying knowledge of the hazard characteristic of the waste in light of the materials or processes used.

Violation of 35 Ill. Adm. Code 722.111 is being alleged for the following reason: **Tradebe Treatment and Recycling, LLC failed to conduct a TCLP analysis toward determining hazardous waste.**

Pursuant to 35 Ill. Adm. Code 722.120(a), a generator that transports hazardous waste or offers a hazardous waste for transportation for off-site treatment, storage, or disposal or a treatment, storage, or disposal facility that offers for transport a rejected load of hazardous waste must prepare a manifest on USEPA Form 8700-22 (and, if necessary, on USEPA Form 8700-22A) according to the instructions included in the appendix to 40 CFR 262 (Uniform Hazardous Waste Manifest and Instructions (EPA Forms 8700-22 and 8700-22A and Their Instructions)), incorporated by reference in 35 Ill. Adm. Code 720.111(b).

A violation of 35 Ill. Adm. Code 722.120(a) is being alleged for the following reason: Tradebe Treatment and Recycling, LLC failed to prepare a Uniform Hazardous Waste Manifest for a roll-off box containing lead contaminated waste (D008) shipped to River Bend Prairie Landfill.

Pursuant to 35 Ill. Adm. Code 728.107(a)(2), if the waste or contaminated soil does not meet the treatment standard or if the generator chooses not to make the determination of whether its waste must be treated, the generator must send a one-time written notice to each treatment or storage facility receiving the waste with the initial shipment of waste to each treatment or storage facility, and the generator must place a copy of the one-time notice in the file. The notice must include the information in column "728.107(a)(2)" of the Generator Paperwork Requirements Table in Table I of this Part. (Alternatively, if the generator chooses not to make the determination of whether the waste must be treated, the notification must include the USEPA hazardous waste numbers and manifest number of the first shipment, and it must include the following statement: "This hazardous waste may or may not be subject to the LDR treatment standards. The treatment facility must make the determination.") No further notification is necessary until such time that the waste or facility changes, in which case a new notification must be sent and a copy placed in the generator's file.

SUGGESTED RESOLUTIONS

1. **IMMEDIATELY** cease sending hazardous waste to River Bend Prairie Landfill.
2. Within 45 days of receipt of this letter, submit to the Illinois EPA what steps Tradebe Treatment and Recycling, LLC will take to help prevent hazardous waste from being shipped to facilities not permitted to accept hazardous wastes.

The written response to this Violation Notice must include information in rebuttal, explanation, or justification of each alleged violation and a statement indicating whether or not you wish to enter into a Compliance Commitment Agreement ("CCA") pursuant to Section 31(a) of the Act. If you wish to enter into a CCA, the written response must also include proposed terms for the CCA that includes dates for achieving each commitment and may include a statement that compliance has been achieved for some or all of the alleged violations. The written response must be submitted to the Illinois EPA by certified mail within 45 days of receipt of this Violation Notice.

MEMORANDUM

DATE:

TO:

BOL Division File

FROM:

Calvin Harris

SUBJECT:

9180890026

- County

Compliance File

Certified Mail Receipt for #

Dated

/VN #L- 2013-0115

RECEIVED
JUL 31 2013
IEPA/BOL

7009 2820 0004 1412 6181

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com**OFFICIAL USE**

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

C.H.
Postmark
Here

Sent to
Tradebe Treatment
Street Apt. No.
or PO Box No.
City, State, ZIP+4
PS Form 3800, August 2010 See Reverse for Instructions

EMENT

SEP 17 2013

REVIEWER MED

RECEIVED

JUL 11 2013

IEPA/BOL

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Tradebe Treatment and Recycling,
Attn: Tita La Grimas
4343 Kennedy Avenue
East Chicago, Indiana 46312

2. Article Number
(Transfer from service label)

PS Form 3811, February 2004

COMPLETE THIS SECTION ON DELIVERY

A. Signature

* Christie L. Olson

- ☐ Agent
☐ Addressee

B. Received by (Printed Name)

CHRISTIE L. OLSON

C. Date of Delivery

6-10-13

- D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

LLC

3. Service Type

- ☐ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

7009 2820 0004 1412 6181

Domestic Return Receipt

102595-02-44-1540

UNITED STATES POSTAL SERVICE



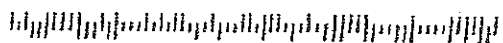
First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •
I.E.P.A.
9511 W. Harrison St.
Des Plaines, IL 60016

RECEIVED

JUN 12 2013

ILLINOIS PA-BOL
DES PLAINES OFFICE



Exhibit

D



TRADEBE

Environmental Services™

July 23, 2013

Illinois EPA -Bureau of Land
Charles T. Grigalauski, Regional Manger
9511 West Harrison Street, 3rd Floor
DesPlaines, Illinois 60016

RECEIVED

JUL 24 2013

ILLINOIS EPA - BOL
DES PLAINES OFFICE

RE: **Tradebe Treatment and Recycling, LLC**
Violation Number: L-2013-01115
Site Identification Number: 9180890026
AZZ Galvanizing/Bodine Flux Filter Processing

Dear Mr. Grigaluaski:

This letter is written, as required by the Illinois Environmental Protection Agency (IEPA) Violation Notice, number L-2013-01115, dated May 28, 2013 and received by Tradebe Treatment and Recycling, LLC (Tradebe) on June 10, 2013. The IEPA actions are a result of the processing of a generator's four (4) waste containers through the Tradebe Solid Waste processing units. These inbound containers that were certified as non-hazardous on a profile and manifest were shredded, solidified and sent to a River Bend Prairie Landfill (River Bend) in Dolton, Illinois. After Tradebe had processed the containers, Tradebe personnel was advised on the regulatory status change of the waste containers. Outlined below is the summary of facts related to this issue; the IEPA findings and the Tradebe response to the IEPA's Violation Notice.

WASTE PROFILING

On October 18, 2012, Bodine Environmental Services of Peoria, (Bodine) acting on behalf of AZZ Galvanizing (AZZ), (a waste generator located in Illinois), completed and submitted to Tradebe, Waste Profile, number 141BSP. Please refer to Attachment 1 to review the hand completed document submitted to Tradebe. Section B WASTE STREAM INFORMATION asks "Is this waste exempt from RCRA Regulations?" Bodine/Azz response was: "Yes" and the notation of was "Non Hazardous" was inserted in a comment block. In Sections C GENERAL CHARACTERISTICS and Section D CHEMICAL COMPOSITION ... to 100%, Bodine/AZZ provided information on the Flux Filter waste. Section F R.C.R.A CHARACTERIZATION, Bodine/AZZ answer "No" to the question "Is this a USEPA "Hazardous Waste" as defined by 40 CFR § 261.3. Finally, in Section H DOT SHIPPING INFORMATION, Bodine/AZZ state that the waste identified on the profile is not a DOT

hazardous material and that a shipping name of "NON RCRA & NON REGULATED BY USEPA & USDOT" is used in describing this waste material on shipping documents.

WASTE SHIPMENT

On February 12, 2013, Tradebe received a shipment of waste, one of which was the non-hazardous waste, profile number: 141BSP. The non-hazardous waste was shipped from AZZ Galvanizing on a hazardous waste manifest, number 009674731 JJK; line 2, DOT description "Non RCRA & Non-Regulated by USEPA and USDOT (Filters, zinc ammonium chloride)", identifies the four (4) fifty-five (55) gallon containers of non-regulated waste, totaling eight hundred (800) pounds that were received at Tradebe on February 12, 2013, please refer to Attachment 2. In accordance with the Tradebe permit requirements, Tradebe inspected and performed analysis on these waste containers.

WASTE RECEIPT

When the shipment arrived, the shipping document was checked against the approved waste profiles in Tradebe's database. All the information reflected on the certified shipping document coincided with the information in our database, from the Generator and/or Agent on behalf of the Generator.

WASTE REVIEW

As with the permit protocol, a sample was collected from this waste, and tested in the Tradebe laboratory. The analysis indicated a: flashpoint greater than one hundred and forty (140) degrees Fahrenheit (F); Negativity for oxidizer presence; Polychlorinatedbipehnyls not present and there was a pH of four (4). The waste containers were received and were readied for plant processing. (While this sequence of events was occurring, Tradebe was not told by the controlling parties of the waste stream, that these containers should be held/cautioned taped, nor was Tradebe informed that a sample was taken to characterize the waste stream.) If Tradebe was informed a sample was taken to determine waste characterization, the containers would have been quarantined until waste analysis information was provided.

WASTE PROCESSING

On February 16, 2013, the eight hundred pounds of the manifested non-hazardous waste flux filters, received at Tradebe, were shredded and processed through the Tradebe Solid Waste tanks. This waste was solidified with sawdust and mixed with other non-hazardous waste. Prior to sending the treated waste offsite on February 18, 2013, it was tested for free liquids via the paint filter test; having passed the test the waste was readied for shipment. A total of 30,100 pounds of solidified profiled and manifested non-hazardous waste was transported to River Bend on outbound manifest number 011059799 JJK. Please refer to Attachment 3, which includes the non-hazardous manifest and the Tradebe weigh ticket for the roll off box in question.

BODINE NOTIFICATION OF ISSUES

On February 27, 2013 Tradebe's customer service was verbally notified by the Bodine Representative, that test results taken by the Bodine of the waste filters had revealed elevated Toxic Characteristic Leaching Procedure (TCLP) results of 8.6 parts per million (PPM). Tradebe requested the results be confirmed and that the written confirmation of the results be sent to Tradebe.

TRADEBE ACTIONS

On February 28, 2013, Tradebe personnel reviewed shipment and receipt of the containers in question. Production documents confirmed the material was processed on February 16, 2013 and the production manager was interviewed regarding the processing of the containers. From this information Tradebe was able to determine when the process waste would have been shipped on February 18, 2013. Outbound manifests and weigh sheets for February 18, 2013 were reviewed and the time frame identified by the process manager indicated that roll off box that contained the shredded drums of flux filter waste along with solidification material and other non-hazardous waste, was shipped on manifest number 011059799 JJK. Also on February 28, 2013, Tradebe personnel again requested copies of the written analytical results from Bodine.

On the afternoon of March 1, 2013 Tradebe received an adjudicated copy of the Generator's laboratory results that illustrated a sample number (i.e., 3013745-02) with a Bodine project number(P18604-13), other data from the report had been deleted. These sample results indicated a waste sample had 8.6 PPM for Lead. A chain of custody or other documents were not provided, to correlate the waste to the analysis. Tradebe advised Bodine, the Broker of the need for complete additional information to be provided to regulatory personnel.

After Tradebe's investigation, including a review of the analysis and subsequent conversations with the parties involved, Tradebe advised Bodine that a self-notification call was to be made by Tradebe to Indiana Department of Environmental Management (IDEM) as well as to the receiving facility. Within 24 hours of confirmation that the waste stream was a hazardous material, Tradebe's Environmental Manager, Bob Vaughn contacted IDEM. Mr. Vaughn also contacted River Bend's home office and was advised to contact Mr. Brian Wozniak. Bob Vaughn called and left a voicemail with Mr. Brian Wozniak, Plant Superintendent for River Bend as he had left for the day.

On March 4, 2013 Bob Vaughn reviewed the information with River Bend personnel, Brian Wozniak and Ms. Charlene Troyer. After the discussion, River Bend advised they would notify the Illinois Environmental Protection Agency (IEPA) of the situation, in which Tradebe agreed. Bob Vaughn then contacted Bodine and requested a complete laboratory

analysis with chain of custody, and an explanation for the relationship between the waste analysis and the filter identification. Tradebe also requested that the explanation clarify the AZZ Galvanizing original manifest date discrepancies to confirm the date the waste containers were shipped. Mr. Aaron Kinkelaar, Bodine Project Manager provided the documents and clarification that Tradebe requested. Please refer to Attachment 4 to review the Bodine provided documents.

IEPA ALLEGED VIOLATIONS

The following excerpts were taken for Attachment A of the IEPA's May 28, 2013 Violation Letter to Tradebe.

A violation of Section 21 (c) of the [Illinois] Environmental Protection Act [415 ILCS 5/21(e)] is alleged for the following reasons: **Hazardous waste disposed at a site, which does not meet the requirements of the Act and regulations for a hazardous waste landfill.**

Violation of 35 IL. Adm. Code 722.11 is being alleged for the following reason: **Tradebe Treatment and Recycling, LLC failed to conduct a TCLP analysis toward determining hazardous waste.**

A violation of 35 Ill. Adm. Code 722.120 (a) is being alleged for the following reason: **Tradebe Treatment and Recycling, LLC failed to prepare a Uniform Hazardous Waste manifest for a roll-off box containing lead contaminated waste (D008) shipped to River Bend Prairie Landfill.**

TRADE RESPONSE

As previously stated, Tradebe abided by the operating permit, industry standards and applicable regulations for waste profiling and processing of the waste in question. "Generator Knowledge" is an USEPA approved method pursuant to 40 CFR 262.(c)(2); an industry standard practice to use a Generator's certified inbound profile and manifest as confirmation of waste regulatory status and also sanctioned for waste classification by the IEPA, refer to Item c.2. Attachment A to the IEPA Violation letter states that a generator must make a waste determination by either testing (item c.1) or as item c.2 states: "Applying knowledge of the hazardous characteristic of the waste in light of the materials or processes used."

Since Tradebe was not apprised by the Broker of the change in regulatory status of the 800 pounds of flux filters until after being processed through the non-hazardous waste solidification tanks, Tradebe unknowingly diluted the wastes' Characteristic's TCLP value to a probability level that makes the waste non-hazardous. The Lead value based on USEPA assumptions for method 1311 was reduced to a level that cannot leach more than the total value in the waste, refer to Attachment 5 for equations.

The logic and mathematics dictates Tradebe could not have shipped a hazardous waste to River Bend Landfill, a non-hazardous waste facility, as previous mentioned since TCLP is NOT mandated by state or federal regulations, Tradebe cannot be in violation since "Generator Knowledge" was (is) used for waste determination; and since a hazardous waste shipment could (did) not occur, no hazardous waste manifest was needed.

We formally request a conference meeting to discuss this with IEPA representatives. Please contact me at 219.397.3951 or email at tita.lagrimas@tradebe.com.

Respectfully,
Tradebe Treatment and Recycling, LLC



Tita LaGrimas
Executive Vice President of Regulatory Affairs

Attachments

Exhibit

E



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829

PAT QUINN, GOVERNOR

LISA BONNETT, DIRECTOR

847/294-4000

847/294-4018 (Fax)

AUG 13 2013

Tradebe Treatment and Recycling, LLC
Ms. Tita LaGrimas
4343 Kennedy Avenue
East Chicago, IN 46312

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
7007 0710 0005 5716 9672

Re: Request for a Meeting
Violation Notice, L-2013-01115
9180890026 - East Chicago, IN
Tradebe Treatment and Recycling, LLC
Compliance File

Dear Ms. LaGrimas:

The Illinois Environmental Protection Agency ("Illinois EPA") acknowledges receiving your July 23, 2013 request for a meeting in response to the May 28, 2013 Violation Notice L-2013-01115. The meeting is scheduled for Thursday, August 29, 2013 at 10:00a.m. at 9511 West Harrison, 3rd floor, Des Plaines, Illinois 60016.

At the meeting there will be an opportunity to respond to each of the alleged violations, suggested resolutions, and suggested implementation time frames listed in Violation Notice, L-2013-01115, and to suggest alternate resolutions. Because you have requested a meeting, the Illinois EPA will make a decision on the written response and the written meeting response within 30 days of receipt of the meeting response [See Section 31(a)(7) of the Act].

Pursuant to Section 31(a)(5) of the Illinois Environmental Protection Act (Act) [415 ILCS 5/31(a)(5)], within 21 days following the meeting, you must submit by certified mail to the Illinois EPA a written response to the alleged violations. The written response must include:

1. Additional information in rebuttal, explanation or justification of each alleged violation;
2. A statement indicating whether or not you wish to enter into a Compliance Commitment Agreement ("CCA") pursuant to Section 31(a) of the Act. If you wish to enter into a CCA, the written response must also include proposed terms for the CCA that includes dates for achieving each commitment and may include a statement that compliance has been achieved for some or all of the alleged violations. The proposed terms of the CCA should contain sufficient detail and must include steps to be taken to achieve compliance and the necessary dates by which compliance will be achieved; and

4302 N. Main St., Rockford, IL 61103 (815) 987-7760
595 S. State, Elgin, IL 60123 (847) 608-3131
2125 S. First St., Champaign, IL 61820 (217) 278-5800
2009 Mail St., Collinsville, IL 62234 (618) 346-5120

9511 Harrison St., Des Plaines, IL 60016 (847) 294-4000
5407 N. University St., Arbor 113, Peoria, IL 61614 (309) 693-5462
2309 W. Main St., Suite 116, Marion, IL 62959 (618) 993-7200
100 W. Randolph, Suite 10-300, Chicago, IL 60601 (312) 814-6026

3. A statement indicating that, should the person complained against so wish, the person complained against chooses to rely upon the initial written response submitted pursuant to Section 31(a)(2) of the Act, 415 ILCS 5/31(a)(2).

Failure to respond in accordance with the requirements of Section 31(a)(5) above will be considered a waiver of the requirements of Section 31(a), and the Illinois EPA may proceed with a referral to a prosecutorial authority.

The Illinois EPA will review the proposed terms for a CCA provided by you and within 30 days of receipt of the written response to the meeting will respond with either a proposed CCA or a notice that no CCA will be issued by the Illinois EPA. If the Illinois EPA sends a proposed CCA, you must respond in writing by either agreeing to and signing the proposed CCA or by notifying the Illinois EPA that you reject the terms of the proposed CCA.

Written communications should be directed to:

Illinois EPA – Bureau of
Attn: Charles T. Grigalauski
9511 West Harrison Street, 3rd Floor
Des Plaines, Illinois 60016

All communications must include reference to your **Violation Notice L-2013-01115**. If you have questions regarding this matter, please contact **Calvin Harris** at 847/294-4080.

Sincerely,



Charles T. Grigalauski
Regional Manager
Field Operations Section
Bureau of Land

SENDER: COMPLETE THIS SECTION		COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature <input checked="" type="checkbox"/> <i>Christie L Olson</i> <input type="checkbox"/> Agent <input type="checkbox"/> Address</p> <p>B. Received by (Printed Name) <i>CHRISTIE OLSON</i> <input type="checkbox"/> Date of Delivery</p> <p>C. Is delivery address different from item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>1. Article Addressed to: <i>Model Treatment & Recycling, LLC</i> <i>attn: Ms Tara LaHume</i> <i>4343 Kennedy Lane</i> <i>East Chicago, IN 46312</i></p>		<p>3. Service Type <input type="checkbox"/> Certified Mail <input type="checkbox"/> Express Mail <input type="checkbox"/> Registered <input type="checkbox"/> Return Receipt for Merchandise <input type="checkbox"/> Insured Mail <input type="checkbox"/> C.O.D.</p>	
<p>2. Article Number (Transfer from service label) 7007 0710 0005 5716 9672</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	

PS Form 3811, February 2004 Domestic Return Receipt 102595-02-M-15

UNITED STATES POSTAL SERVICE
 19 AUG 2013 PM 5:11
 First-Class Mail
 Postage & Fees Paid
 USPS
 Permit No. 6-19

* Sender: Please print your name, address, and ZIP+4 in this box *

Illinois & P.A. - BOL
9511 West Madison St. 3rd fl.
Des Plaines, IL 60018
attn: Calvin

RECEIVED
 AUG 26 2013
 ILLINOIS EPA - BOL
 DES PLAINES OFFICE

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
 (Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark Here

Sent to
Model Treatment & Recycling
 Street Apt. No. or P.O. Box No. *4343 Kennedy Lane*
 City/State/ZIP+4 *East Chicago IN 46312*

PS Form 3800, August 2006 See Reverse for Instructions

Exhibit

F



TRADEBE

Environmental ServicesTM

September 12, 2013

Certified Mail 7006 0810 0000 9255 9259

RECEIVED

SEP 17 2013

ILLINOIS EPA-801
DES PLAINES OFFICE

Charles T. Grigalauski
Regional Manager
Illinois Environmental Protection Agency
Bureau of Land
9511 West Harrison Street, 3rd Floor
DesPlaines, Illinois 60016

RE: **Compliance Commitment Agreement**
Tradebe Treatment and Recycling, LLC
Violation Number: L-2013-01115
Site Identification Number: 9180890026
AZZ Galvanizing/Bodine Flux Filter Processing

Dear Mr. Grigalauski:

This letter is written to serve as the Tradebe Treatment and Recycling, LLC (Tradebe) Compliance Commitment Agreement (CCA) as part of the Tradebe actions associated with the Illinois Environmental Protection Agency (Illinois EPA) Violation Notice, number L-2013-01115, dated May 28, 2013. The Violation letter and CCA were topics of discussion in the August 29, 2013 meeting with Illinois EPA and Tradebe representatives. You and Mr. Calvin Harris represented Illinois EPA and Robert Vaughn and I represented Tradebe.

The Illinois EPA violation letter stems from a shipment of profiled non-hazardous waste from an Illinois Generator, through a broker/transporter to Tradebe's East Chicago, Indiana facility. The certified profiled non-hazardous waste was received, reviewed, tested and processed as non-hazardous by Tradebe. Only after Tradebe processed the waste, which was solidified with other non-hazardous waste and sent to the non-hazardous landfill, was Tradebe alerted by the broker that analysis for the waste in question had elevated Toxic Characteristic Leaching Procedure (TCLP) levels, for lead, of eight and six tenths (8.6) parts per million.

Attachment A of the Illinois EPA violation letter, the Illinois EPA has "Suggested Resolutions" were:

1. Immediately cease sending hazardous waste to the receiving landfill.
2. Within 45 days of receipt of the letter, submit to the Illinois EPA what steps Tradebe will take to help prevent hazardous waste from being shipped to facilities not permitted to accept hazardous waste.

In accordance with the Illinois EPA regulations 415 ILCS 5/31, Tradebe wishes to enter into a CCA with the Illinois EPA. Tradebe responded to the Illinois EPA violation letter on July 23, 2013. Tradebe wishes to include that "initial written response" as part of the Tradebe CCA package as allowed by Section 31 (a)(2) of 415 ILCS 5/31 regulations.

With respect to the compliance schedule, Tradebe's East Chicago site did not knowingly ship hazardous waste to non-hazardous waste facilities. Tradebe followed the industries regulatory standards, such as: obtaining a completed and extensive waste profile questionnaire; followed by Tradebe's technical approval staff reviewing the waste profile for approval (or denial). Upon approval the Generator was provided an approval letter stating Tradebe will accept the non-hazardous waste. Lastly, upon receipt of the waste shipment, an inbound waste review (physical inspection) and analysis was conducted.

Tradebe would like to add that the Tradebe waste profile seeks "key" responses from the generator or their agents. Tradebe seeks information as to how a waste determination as made? Is there any analytical data associated with this waste determination? Was a representative sample utilized for the waste determination or was some other form of data utilized? Finally, the Generator Certification at the end of the profile prompts the generator or their agent to acknowledge that the waste is properly characterized and that "no omissions of characteristics, composition or properties exist". Again, all these items are industry standards for waste profile. Had the generator's agent advised Tradebe personnel that samples were collected from the waste stream prior to Tradebe's receipt of the waste, Tradebe would have quarantined the waste containers until the generator's agent advised Tradebe of the results. This too is an industry standard practice.

For the instance in question, the generator/broker actions (or lack thereof) precipitated the circumstances for generation of the Illinois EPA violation letter - the broker action information is outlined in the Tradebe July 23, 2013 response letter. Nevertheless, Tradebe has learned from this instance and therefore has reached out to our customers emphasizing possible actions and USEPA resources to make proper waste determinations, please refer to Tradebe's revised brochure that will be posted on Tradebe's website. Furthermore, Tradebe's Environmental Department has shared this experience with our

Environmental Training Department with the instruction to develop training sessions to further educate Tradebe employees involved in the waste approval process.

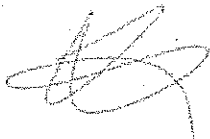
As permitted by Section 31 (a)(2) (A) – additional information for rebuttal, explanation or justification for each alleged violation, Tradebe would like to provide the following Tradebe documents:

1. Tradebe Generator Waste Profile Sheet, with instructions;
2. Tradebe Environmental Group Informational Update – Waste Profile Communication-The Exchange of Information”; and
3. Waste Shipment Check-off Sheet

Tradebe's customer (e.g., generator and Broker) service includes support and continuing education for the Generators and Brokers. The aforementioned documents, as well as similar documents released in the past, are provided to the customers as to reduce the likelihood of these kinds of issues from occurring. Tradebe's goal is for 100 percent compliance, not only for the Tradebe facility, but as for as much as Tradebe can help contribute to the generators we service compliance programs.

Mr. Grigalauski and Mr. Harris, thank you again for meeting with us. We appreciated you allowing us to explain the circumstances regarding this instance and for Mr. Harris' review of the CCA process. Should you or your staff have any questions regarding this submittal, please contact me at 219.397.3951 or email at tita.lagrimas@tradebe.com or Mr. Robert Vaughn at 800.388.7242, or email robert.vaughn@tradebe.com.

Respectfully,
Tradebe Treatment and Recycling, LLC



Tita LaGrimas
Executive Vice President of Regulatory Affairs

Enclosure

Cc: Calvin Harris, IEPA
Robert Vaughn, Tradebe



TRADEBE
Environmental Services™

Attachment 1
Tradebe Generators Waste Profile Sheet
(With instructions)

Tradebe Treatment and Recycling, LLC

4343 Kennedy Avenue • East Chicago, IN 46312 • Phone: (800) 386-7242 • (219) 397-3951 • Fax: (219) 397-6411 • www.tradebe.com



TRADEBE

Environmental Services, LLC

TRADEBE TREATMENT AND RECYCLING, LLC

Profile # _____

GENERATOR WASTE STREAM PROFILE SHEET

Process Code _____

Fax or email completed profile sheet to:

TTR Fax: 219-397-6411

TTR NE: 203-238-6744

usa.approvals@tradebe.com

A. GENERATOR INFORMATION:**MAILING OR SITE ADDRESS***USE CONTINUATION IF SITE & MAILING ADDRESSES ARE DIFFERENT*

Generator #:

Generator Name:

Generator Address:

City:

State:

Zip:

Contact Name:

Generator Phone:

Generator Fax:

Generator Email:

Generator USEPA/Federal ID #:

If no ID number is the Generator a "Conditionally Exempt Small Quantity Generator?"

Yes No

Generator SIC (or NAIC) Code:

Generator State ID # (If applicable):

Please check if generator has "No Canada Disposal" policy

Yes No

Please check if generator has "No Landfill" policy

Yes No

CUSTOMER INFORMATION:

Customer #:

Customer Name:

Customer Address:

City:

State:

Zip:

Contact Name:

Customer Phone:

Customer Fax:

Customer Email:

Customer Service/Sales Rep:

B. WASTE STREAM INFORMATION:

Generator's Waste Name:

Original Process Generating Waste:

Is this waste exempt from RCRA regulation?

Yes No

If "yes" explain or cite regulation on continuation (Example HHW, CESQG):

Current method of disposal:

Is this waste from a CERCLA cleanup site?

Yes No

Waste determination was made by: Testing Generator Knowledge MSDS Sample Other

(Attach analytical, MSDS, or other supporting documentation used for waste determination)

Does the Waste have any of the following characteristics?

Yes (if yes check all that apply)

No

Oxidizer

Dioxin or Suspect

Water Reactive

Air Reactive

Organic Peroxide

Hexachrome

Infectious Waste

Radioactive

Chelating Agent

Lachrymator

Explosive

Shock Sensitive

Polymerizer

Pyrophoric

Inhalation Hazard, Zone

C. GENERAL CHARACTERISTICS:

Color:

Physical state @ 70 F

Phases

BTU/lb

pH

Odor:

% liquid

aerosol

single layer

<3000(Ex: water)

<2 (Acid) 10.0-12.5

None

% solid

powder

double layer

3,000-5,000

2.0-4.0 >12.5 (Base)

Mild

% sludge

other

>2 layers

5,000-10,000

4.0-10.0

Strong

% debris

how many?

>10,000 (Ex: oil)

Liquid Flashpoint:

<73 F

73 to 99 F

100 to 139 F

140 to 200 F

>200 F

None

Boiling Point

Specific Gravity:

Total Halogens:

%

Total Organic Carbon (TOC):

%

Viscosity:

D. CHEMICAL COMPOSITION: Total of Maximum concentration must be > or = to 100%.

Constituents

Min%

Max%

ppm

Constituents

Min%

Max%

ppm

Does the Waste contain any of the following?

Metal Pieces:

Yes No

If yes, Describe Metal:

Nitrocellulose:

Yes No

Metal Powder or Flake:

Yes No

Sharps:

Yes No

Isocyanates:

Yes No

Asbestos: (If yes, must be double bagged and wetted)

Yes No

Reactive cyanide: (If yes, indicate level in ppm)

Yes No

Range of reactive cyanide

Reactive sulfide: (If yes, indicate level in ppm)

Yes No

Range of reactive sulfide

PCBs: None 0-49 ppm 50-499 ppm 500+ ppm (If waste contains PCBs, certification form is required)

Does the waste contain Benzene?

Yes No

If yes, check all SIC codes that cover operations at your facility

Yes No

2812 2813 2816 2819 2821 2822 2823 2824 2833 2834 2835 2836 2841 2842 2843 2844 2851 2861

2865 2869 2873 2874 2875 2879 2891 2892 2893 2896 2899 2911 2999 3312 4953 4959 9511

If waste contains benzene and falls under one of the above SIC codes, Tradebe's benzene NESHA form is required for each shipment

WASTE WATER ANALYSIS

Profile # _____

For waste streams being managed through TTR NE's wastewater treatment operations only:

Phases: Oil _____ % Water _____ % Interface _____ % Sediments _____ % DNAPL _____ %								
Petroleum Phase	Suspected Level	Actual Level	Aqueous Phase	Suspected Level	Actual Level	Aqueous Phase	Suspected Level	Actual Level
PCB			Copper			Cobalt		
Halogens			Cadmium			Mercury		
Solvents			Chromium			Arsenic		
Arsenic			Lead			Barium		
Cadmium			Nickel			Sulfides		
Chromium			Silver			Cyanides		
Lead			Zinc			Phenols		
			COD			Glycols		
			Iron			Selenium		

List Specific Solvents: _____

E. OTHER WASTE STREAM INFORMATION:

Is this waste a USED OIL per 40CFR PART 279? _____ Yes _____ No

If Yes, does the total halogen content exceed 1,000 ppm? _____ Yes _____ No

If Yes, can you identify the Chlorinated Constituent present in the oil? _____ Yes _____ No

If Yes, can you rebut the presumption that this material is a Hazardous Waste? _____ Yes _____ No

Is the Waste subject to RCRA 40 CFR Subpart CC controls (Are Volatile Organic Compounds >500ppmw)? _____ Yes _____ No

Does the Waste contain any Class I or Class II ozone-depleting substances? _____ Yes _____ No

Does waste contain EPCRA 313 chemicals identified in 40 CFR 372.65? _____ Yes _____ No

If yes list in Additional Information on Continuation Page.

Does this waste contain any Chemicals of Interest listed in 6 CFR Part 27 Appendix A (Department of Homeland Security)? If yes please list in Additional Information on Continuation Page. _____ Yes _____ No

F. RCRA CHARACTERIZATION:

Is this a USEPA Hazardous Waste as defined in 40 CFR 261.3? _____ Yes _____ No

Is this a Universal Waste per 40 CFR part 273? _____ Yes _____ No

Please list any characteristic codes (D001-D043): _____

Does the waste contain UHCs above treatment standards levels? (40 CFR 268.48, 268.7) _____ Yes _____ No

If yes identify those chemicals in Appendix I - Underlying Hazardous Constituents

Please list any applicable "F" or "K" codes: _____

Please list any applicable "U" or "P" codes: _____

Please list any state regulated codes: _____

G. SHIPPING VOLUME & FREQUENCY:

_____ Bulk Liquid (tanker) _____ Approximately how many gallons? _____ Bulk Solids(roll-off box, vacuum box, etc)

_____ Cubic Yard Boxes _____ Totes _____ size in gallons _____ Metal _____ Plastic

_____ Skid _____ Other If other, please describe: _____

_____ Drums (Specify size) 85 55 30 15 5 _____ Metal _____ Plastic _____ Fiberboard

Is waste a combination package (e.g. Drum with inner containers or skid with cases of consumer products) _____ Yes _____ No

Shipping Frequency: Number of Units _____ Per _____ Month _____ Quarter _____ Year _____ Other _____

H. DOT SHIPPING INFORMATION

Is this a U.S. Department of Transportation (USDOT) Hazardous Material? _____ Yes _____ No

Shipping Name per 49 CFR 172.101 Hazardous Materials Table: _____

Hazard Class or Division: _____ UN/NA #: _____ Packing Group: _____ I _____ II _____ III _____ ERG #: _____

Technical descriptors if required: _____ RQ if required: _____

DOT Special Permit that may apply (Include copy of permit): _____ Inhalation Hazard: Zone _____

I. GENERATOR CERTIFICATION:

I agree by affixing my authorized signature that I hereby certify that the above and attached description is complete and accurate and that no omissions of characteristics, composition or properties exist and that all known or suspected hazards have been disclosed and that all shipments referencing the profile number assigned to the waste stream described herein shall in all respects be consistent with the description. I further certify that each sample provided to Tradebe is representative of the waste material described above and give Tradebe permission and consent to make amendments and corrections and that I am an authorized agent of the Generator.

Name (print): _____ Title: _____

Signature: _____ Date: _____

INTERNAL USE ONLY: Please indicate which Tradebe Facility(s) are being utilized for this Profile

_____ TTR, LLC, East Chicago, IN

_____ TTR of TN, LLC, Millington, TN

_____ TTR of Meriden, LLC, Mer

_____ TTR of Bridgeport, LLC, Bridgeport, CT

_____ TTR of Newington, LLC, Newington, NH

_____ TTR of Stoughton, LLC, Stoughton, MA

_____ TTR of Northborough, LLC, Northborough, MA

_____ Norlite Corp Cohoes, NY

Section A - Generator & Customer Information:

- Complete the required address information involved with this waste.
- If the location the waste will be picked-up is different from the generator's physical address, refer to the profile continuation p: 4343tradebe
- Generator's 12 digit alpha numeric EPA identification number.
If generator does not have an EPA ID number, indicate if they are a Conditionally Exempt Small Quantity Generator
- Standardized Industrial Classification (SIC code) is US government system that assigns a code to businesses based on the type of business. Several waste streams are SIC specific and some require extra handling based on the waste stream origins. For assistance reference: <http://www.sec.gov/info/edgar/siccodes.htm>
- Generator State ID number, if applicable.
- "No Canada" or "No Landfill" policy. Indicate if the generator has any restrictions on the waste stream going for landfill or to Canada for disposal.

Section B - Waste Stream Information:

- *Generator's Waste Name* - This is name the generator uses to identify their waste (i.e. paint clean up, cured resin, landfill leachate, etc.). There are no requirements for the waste name, however, if it is an unused/expired product Tradebe recommends using the product name in this section.
- *Original process generating waste* - Detailed description of process generating waste.
- *Is this waste exempt from RCRA regulations?* - Some wastes, although they fit the description of hazardous waste, are exempt/excluded from RCRA regulation. If your waste is exempt mark it here and cite the exemption. Use continuation page if necessary.
- *Current method of disposal* - Identify the current method of disposal for this waste stream, if applicable.
- *Is this waste from a CERCLA cleanup site?* - Indicate if waste is from a Superfund or other government ordered cleanup
- *Waste determination was made by?* - Indicate what information was used to determine if the waste was hazardous. Acceptable methods of determination: Testing, generator knowledge, MSDS, sample, other (not inclusive list)
- *Does the waste have any of the following characteristics?* - Identify high-hazardous characteristics. Waste streams with these characteristics may pose an additional safety concerns and require special handling and packaging.

Section C - General Characteristics:

- *Color* - Color(s) of the waste.
- *Odor* - Odor of waste. Odorous waste streams will require special handling. Examples may include thiols, butyric acid, amines, mercaptan, sulfides, etc.
- *Physical State* - Indicate physical state and include each waste phases. (e.g. 90% liquid with 10% sludge).
- *Phases* - Indicate how many phases or layers this waste may have. (e.g. non-soluble oil and water is two phases).
- *BTU* - BTU is the heat energy contained in a waste. Substances like oil and flammable liquids have very high BTU and waste with high water have very low BTU. BTU can be an indication of organic content or a material's suitability for fuel blending.
- *pH* - pH measures the corrosivity of a waste. The pH scale goes from 0 (acidic) to 14 (basic) with pH 7 being neutral or non-corrosive material.
- *Flashpoint* - Flashpoint is the temperature at which a liquid will emit enough vapors to form an ignitable mixture with air. Flashpoint <140 F are DOT and RCRA flammable liquids.
- *Boiling Point* - Enter temperature at which the waste will boil.
- *Specific Gravity* - SG is the weight of a material relative to that same volume of water. Example: 1 gallon of water weighs 8.3lb, if a substance has an SG of 1.5 that means 1 gallon would weight $8.3 \times 1.5 = 12.45\text{lb}$
- *Total Halogens* - Indicate the % of chlorine, fluorine, bromine, and iodine in the waste
- *Total Organic Carbon* - This is the total amount of carbon in the waste derived from organic sources (Organic sources include: oil, gasoline, solvents, acetic (not an inclusive list))

Section D - Chemical Composition:

- *Constituents* - List all the constituents that make up this waste stream and their ranges. The constituents can be listed as a % range or at ppm levels.

The composition on the profile must add up to 100% for Tradebe to remain in compliance. Inert ingredients, non-hazardous materials, & Trade Secret ingredients need to be identified. Uses of MSDS (Materials Safety Data Sheets) are helpful to identify constituents.

- *Does the waste contain any of the following?* - Indicate if the waste stream contains any of the constituents listed, these constituents may require special waste packaging and /or handling.
- *Does the waste contain benzene?* - If you answer "NO", skip the next question regarding the SIC codes. If "YES" indicate if any of the listed SIC codes cover the operations at your facility
- *Do any of the following Standard Industrial Code (SIC) codes cover the operations at your facility?* - The SIC codes listed may indicate the facility, operations and waste streams are regulated under the Clean Air Act 40 CFR Part 61 Subpart FF, National Emission Standards for Benzene Waste Operations.

If the waste stream contains benzene and is generated from a facility operating under one of the listed SIC codes, to meet all regulatory requirements Tradebe MUST take extra steps in receiving, handling, processing and reporting the waste as a benzene NESHAP waste stream. During the review process of the waste stream profile a supplemental benzene NESHAP addendum form will be requested for completion prior to approval of the waste stream and will be required with each shipment there after.

- For assistance with the SIC code reference the SIC tab of this file, or to the website listed in Section A Instructions.

WASTE STREAM PROFILING INSTRUCTIONS: Page 2

- Waste Water Analysis- Complete this portion of section D only if the particular waste stream is destined for treatment at a TTR NE wastewater treatment facility.

Section E – Other Waste Stream Information:

- Is this waste a USED OIL per 40 CFR Part 279? – Indicate if this is a used oil.
 - o If YES, does the total halogens exceed 1,000 ppm? – Indicate if the used oil contains total halogens exceeding 1,000 ppm.
 - o If YES, can you identify the chlorinated constituent - Check YES if you know how the waste became contaminated with chlorine
 - o If YES, can you rebut the presumption the material is a hazardous waste? – Used oil containing more than 1,000 ppm total halogens is presumed to be a hazardous waste because it has been mixed with halogenated hazardous waste listed in subpart D of part 261. Generators may rebut this presumption by demonstrating that the used oil does not contain hazardous waste. If this is the case a supplemental rebuttable presumption addendum form will be requested for completion prior to approval of the waste stream.
- Does this waste contain any Class I or Class II ozone-depleting substances? (e.g. CFCs and highly halogenated organic compounds).
- Does waste contain EPCRA 313 chemicals identified in 40 CFR 372.65?
The Emergency Planning and Community Right-to-Know Act requires business to report any chemicals on their site that are found in the EPCRA regulations
<http://www.epa.gov/ceppo/pubs/title3.pdf>
- Does this waste contain any 'Chemicals of Interest' listed in 6 CFR Part 27 Appendix A
If you are viewing this with MS Excel there is an additional sheet (or tab) that contains the DHS Chemicals of Interest. If this is a paper copy, please reference this web site for the DHS Chemical of Interest list.
http://www.dhs.gov/xlibrary/assets/chemsec_appendixa-chemicalofinterestlist.pdf

Section F – RCRA Characterization:

- Is this a USEPA Hazardous Waste as defined in 40 CFR 261.3? – Waste carrying RCRA codes are considered USEPA hazardous waste.
- Is this a Universal Waste per 40 CFR Part 273? – Universal Waste, includes discarded hazardous waste batteries, some pesticides, mercury containing equipment, and lamps.
- List characteristic codes (D001 – D043) – List all D-Codes required by 40 CFR 261.21, 261.22, 261.23, and 261.24? Underlying Hazardous Constituents - For the Land Disposal Restriction Notification the EPA requires all waste carrying D-codes to also list the UHCs present in the waste. Review the list of UHC on Appendix I and check all that are present in the composition.
- List any applicable "F" or "K" codes – Is it a hazardous waste listed under 40 CFR 261.31.
- List any applicable "U" or "P" codes – Is it hazardous waste listed under discarded commercial chemical products, off-specification species, container residues, and spill residues per 40 CFR 261.33.
- List any state regulated codes – Some states require codes assigned by the state's waste management regulations. Include any such codes here.

Section G – Shipping Information:

- Indicate the shipping container, type, size, quantity and shipping frequency.

Section H – DOT Shipping Information:

- Is this a USDOT Hazardous Material? – Answer yes if your waste requires a proper shipping name, hazard class, and UN/NA number.
- Proper Shipping Name per 49 CFR 172.101 Hazardous Materials Table: Hazard Class, UN/NA identification number, packaging group – Review 49 CFR 172.101 and determine hazardous materials shipping description.
- Technical descriptors if required, RQ if required – Review 49 CFR 172.203(k) for explanation of when technical descriptors are required and indicate one or two descriptors as applicable. Review Table 1 to Appendix A in 172.101, Hazardous Substances Other Than Radionuclides, and indicate the RQ value if applicable.
- DOT Special Permit – Indicate DOT-SP required for transporter and include a copy of the special permit

Section I – Generator Certification:

- The generator must print their name, title, sign and date, verifying that the completed profile is accurate and that no omissions or characteristics, composition or properties exist and that all known or suspected hazards have been disclosed.

If you have additional questions on completing the profile or LDR, please contact your customer service representative.



TRADEBE

Environmental Services, LLC

GENERATOR WASTE STREAM PROFILE ADDITIONAL INFORMATION SHEET

PLEASE PRINT IN INK OR TYPE

Site Address (if different from generator address): _____

Site Name (if different from generator): _____

Pick-up Address: _____

Additional Location Identification: _____

City: _____ State: _____ Zip: _____

Contact Name: _____

Contact Phone: _____

Contact Fax: _____

Generator USEPA/Federal ID # (if different than generators): _____

Facility Restrictions (if any): _____

B. WASTE STREAM INFORMATION CONTINUATION

Exemption: The waste described on this profile sheet is exempt/excluded from RCRA regulation under:

(Cite regulation exempting waste from RCRA) _____

D. CHEMICAL COMPOSITION CONTINUATION: Total of Maximum concentration must be > or = to 100%.

Constituents	Min%	Max%	ppm	Constituents	Min%	Max%	ppm
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____
_____	_____	_____	_____	_____	_____	_____	_____

G. R.C.R.A. CHARACTERIZATION CONTINUATION:

Additional characteristic codes (D001-D043): If waste carries a characteristic code, please check all applicable Underlying Hazardous Constituents in Appendix I: _____

List additional F or K codes: _____

List additional U or P codes: _____

Additional State codes if required: _____

ADDITIONAL INFORMATION

(Use this space to include any other information about this waste)

Tradebe

Land Disposal Restriction Notification Form

Manifest # for initial Shipment _____



TRADEBE

Environmental Services, LLC

- The waste described on waste stream profile _____ is not regulated under RCRA 40 CFR
 The waste described on waste stream profile _____ does not meet the applicable
 treatment standards in 40 CFR 268 Subpart D (Does this waste stream carry any RCRA Codes?).
 Analysis is included (if available)

TREATABILITY GROUP

- Waste is a wastewater stream (Waste contains <1% Total Organic Carbon & <1% Total Suspended Solids)
 Waste is a non-wastewater stream

CHARACTERISTIC WASTE

CODE	SUBCATEGORY/CONSTITUENTS	CODE	SUBCAT/CONSTITUENTS	CODE	SUBCAT/CONSTITUENTS
D001	Ignitable Wastes (TOC>10%)	D009*	High Mercury-Organic >260ppm	D025*	p-Cresol
D001*	Ignitable Wastes (TOC<10%) Managed in Non-CWA or Equivalent/Non-Class 1 SDWA System	D009*	High Mercury-Inorganic >260ppm	D026*	Cresols (Total)
D001	Ignitable Wastes (TOC<10%) Managed in a CWA or Equivalent Class I SDWA System	D009*	Low Mercury <260ppm	D027*	p-Dichlorobenzene
D002*	Corrosive Wastes Managed in Non-CWA or Equivalent/Non-Class 1 SDWA System	D009*	Mercury Wastewater	D028*	1,2-Dichloroethane
D002	Corrosive Wastes Managed in CWA or Equivalent/Class I SDWA System	D010*	Selenium	D029*	1,1-Dichloroethylene
D003	Reactive Sulfides based on 261.23(a)(5)	D011*	Silver	D030*	2,4-Dinitrotoluene
D003*	Other Reactive based on 261.23(a) (1)	D012*	Endrin	D031*	Heptachlor
D003*	Water Reactive based on 261.23(a) (2),(3),(4)	D013*	Lindane	D032*	Hexachlorobenzene
D003	Reactive Cyanides based on 261.23 (a) (5)	D014*	Methoxychlor	D033*	Hexachlorobutadiene
D004*	Arsenic	D015*	Toxaphene	D034*	Hexachloroethane
D005*	Barium	D016*	2,4-D	D035*	Methyl ethyl ketone
D006*	Cadmium	D017*	2,4,5-TP (Silvex)	D036*	Nitrobenzene
D006*	Cadmium Containing Batteries	D018*	Benzene	D037*	Pentachlorophenol
D007*	Chromium	D019*	Carbon Tetrachloride	D038*	Pyridine
D008*	Lead	D020*	Chlordane	D039*	Tetrachloroethylene
D008*	Lead Acid Batteries	D021*	Chlorobenzene	D040*	Trichloroethylene
		D022*	Chloroform	D041*	2,4,5-Trichlorophenol
		D023*	o-Cresol	D042*	2,4,6-Trichlorophenol
		D024*	m-Cresol	D043*	Vinyl chloride

If the waste identified by an asterisk (*) contains any Underlying Hazardous Constituents see APPENDIX I per 268.7 (a)(1)

F001 - F005 LISTED WASTE

F001 F002 F003 F004 F005

CHECK REGULATED CONSTITUENTS FOR LISTED WASTE IDENTIFIED ABOVE (F001-F005)

Acetone	2-Ethoxyethanol (F005 only)	Methyl Ethyl Ketone	1,1,2-Trichloroethane
Benzene	o-Dichlorobenzene	Methyl Isobutyl Ketone	1,1,2-Trichloro-1,2,2-trifluoroethane
N-Butyl Alcohol	Ethyl acetate	Nitrobenzene	Trichloroethylene
Carbon Disulfide	Ethyl benzene	Pyridine	Trichloromonofluoromethane
Carbon Tetrachloride	Ethyl ether	Tetrachloroethylene	Xylenes
Chlorobenzene	Isobutyl alcohol	Toluene	Chlorinated Fluorocarbons (F001)
Cresols (o,m, or p iso)	Methanol	2-Nitropropane (F005 only)	Contains any combination of ONLY the following: carbon disulfide, cyclohexanone, and methanol (F003/F005 only).
Cyclohexanone	Methylene Chloride	1,1,1-Trichloroethane	

CODE SUBCATEGORY/CONSTITUENTS

F025	Light Ends
F025	Spent filters / aids and dessicants
K006	Anhydrous
K006	Hydrated
K069	Low Lead
K069	High Lead
K071	Non wastewaters that are residues from RMERC
K071	Non wastewaters not residues from RMERC
K071	All K071 wastewaters
K106	Non wastewaters that contain >260ppm Hg
K106	Non wastewaters that contain <260ppm Hg from RMERC
K106	Other non wastewaters that contain <260ppm Hg
K106	All K106 wastewaters
K175	Non wastewaters
K175	All K175 wastewaters
P047	4,6-dinitro-o-cresol
P047	4,6-dinitro-o-cresol salts

CODE SUBCATEGORY/CONSTITUENTS

P065	Non wastewaters, not incinerator or RMERC residues
P065	Non wastewaters from incinerator or RMERC residue w/ >260ppm Hg
P065	Non wastewaters from RMERC residue w/ <260ppm Hg
P065	Non wastewaters from incinerator residue w/ <260ppm Hg
P065	All mercury fulminate wastewaters
P092	Non wastewaters not incinerator or RMERC residues
P092	Non wastewaters incinerator or RMERC residues >260ppm Hg
P092	Non wastewaters from RMERC residue w/ <260ppm Hg
P092	Non wastewaters from incinerator residue w/ <260ppm Hg
P092	All phenyl mercuric acetate wastewaters
U151	Non wastewaters >260ppm Hg
U151	Non wastewaters from RMERC residues w/ <260ppm Hg
U151	Non wastewaters from not RMERC residues w/ <260ppm Hg
U151	All U151 (mercury) wastewaters
U240	2,4-D
U240	2,4-D salts and esters

OTHER WASTE CODES

List additional codes below (include continuation page if more space is required).

Waste Stream Profile

Environmental Services, LLC[®][illegible]

APPENDIX I - LDR - UNDERLYING HAZARDOUS CONSTITUENTS LISTING
 IF THE WASTE CARRIES A CHARACTERISTIC CODE (D-CODE) YOU MUST CHECK ALL CHEMICALS THAT ARE PRESENT IN
 IN THE WASTE STREAM PROFILE IN AMOUNTS GREATER THAN THE UNIVERSAL TREATMENT STANDARDS IN 40 CFR 268.48

Acenaphthylene	bis(2-Chloroethyl)ether	2,6-Dinitrotoluene	Methyl Ethyl Ketone	1,2,4,5-Tetrachlorobenzene
Acenaphthene	Chloroform	Di-n-octyl phthalate	Methylene Chloride	TCDD
Acetone	bis(2-Chloroisopropyl)ether	Di-n-propylnitrosamine	Methyl isobutyl ketone	TCDF
Acetonitrile	p-Chloro-m-cresol	1,4-Dioxane	Methyl methacrylate	1,1,1,2-Tetrachloroethane
Acetophenone	2-Chloroethyl vinyl ether	Diphenylamine	Methyl methanesulfonate	1,1,2,2-Tetrachloroethane
2-Acetylaminofluorene	Chloromethane	Diphenylnitrosamine	Methyl parathion	Tetrachloroethylene
Acrolein	2-Chloronaphthalene	1,2-Diphenylhydrazine	Metolcarb	2,3,4,6-Tetrachlorophenol
Acrylamide	2-Chlorophenol	Disulfoton	Mexacarbate	Thiodicarb
Acrylonitrile	3-Chloropropylene	Dithiocarbamates	Mofinate	Thiophanate-methyl
Aldicarb sulfone	Chrysene	Endosulfan	Naphthalene	Toluene
Aldrin	o-Cresol	Endosulfan II	2-Naphthylamine	Toxaphene
4-Aminobiphenyl	m-Cresol	Endosulfan sulfate	o-Nitroaniline	Triallate
Aniline	p-Cresol	Endrin	Nitroaniline	Bromoform
Anthracene	m-Cumenyl methylcarbamate	Endrin aldehyde	Nitrobenzene	1,2,4-Trichlorobenzene
Aramid	Cyclohexanone	EPTC	5-Nitro-o-toluidine	1,1,1-Trichloroethane
alpha-BHC	o,p-DDD	Ethyl acetate	Nitrophenol	1,1,2-Trichloroethane
beta-BHC	p,p'-DDD	Ethyl benzene	p-Nitrophenol	Trichloroethylene
delta-BHC	o,p-DDE	Ethyl cyanide	N-Nitrosodiethylamine	Trichlorofluoromethane
gamma-BHC	p,p'-DDE	Ether	N-Nitrosodimethylamine	2,4,5-Trichlorophenol
Barban	DDT	Ethyl methacrylate	N-Nitroso-di-n-butylamine	2,4,6-Trichlorophenol
Bendiocarb	p,p'-DDT	Ethylene oxide	N-Nitrosomethylamine	2,4,5-Trichlorophenoxyacetic acid
Benomyl	Dibenz(a,h)anthracene	Famphur	N-Nitrosomorpholine	1,2,3-Trichloropropane
Benzene	Dibenz(a,e)pyrene	Fluoranthene	N-Nitrosopiperidine	1,1,2-Trichloro-1,2,2-trifluoroethane
Benz(a)anthracene	1,2-Dibromo-3-chloropropane	Fluorene	N-Nitrosopyrrolidine	Triethylamine
Benzal chloride	1,2-Dibromoethane	Formetanate hydrochloride	Oxamyl	tris-(2,3-Dibromopropyl)phosphate
Benzo(b)fluoranthene	Ethylene dibromide	Heptachlor	Parathion	Vinyl chloride
Benzo(k)fluoranthene	Dibromomethane	Heptachlor epoxide	PCB	Xylenes
Benzo(g,h,i)perylene	m-Dichlorobenzene	heptachlorobenzene	Pebulate	Antimony
Benzo(a)pyrene	o-Dichlorobenzene	Hexachlorobutadiene	Pentachlorobenzene	Arsenic
Bromodichloromethane	p-Dichlorobenzene	Hexachlorocyclopentadiene	PeCDD	Barium
Bromomethane	Dichlorodifluoromethane	Hexachlorobenzene-p-dioxins	PeCDF	Beryllium
4-Bromophenyl phenyl ether	1,1-Dichloroethane	HxCDD	Pentachloroethane	Cadmium
n-Butyl alcohol	1,2-Dichloroethane	Hexachlorodibenzofurans	Pentachloronitrobenzene	Chromium
Butylate	1,1-Dichloroethylene	HxCDF	Pentachlorophenol	Cyanides (total)
Butyl benzyl phthalate	trans-1,2-Dichloroethylene	Hexachloroethane	Phenacetyl	Cyanides
2-sec-Butyl-4,6-dinitrophenol	2,4-Dichlorophenol	Indeno(1,2,3-c,d) pyrene	Phenanthrene	Fluoride
Carbaryl	2,6-Dichlorophenol	Iodomethane	Phenol	Lead
Carbenzadim	2,4-D	Isobutyl alcohol	Phorate	Mercury (non waste water from retort)
Carbofuran	1,2-Dichloropropane	Isodrin	Phthalic acid	Mercury (all others)
Carbofuran phenol	cis-1,3-Dichloropropylene	Isosafrole	Phthalic anhydride	Nickel
Carbon disulfide	trans-1,3-Dichloropropylene	Kepone	Physostigmine	Selenium
Carbon tetrachloride	Dieldrin	Methacrylonitrile	Physostigmine salicylate	Silver
Carbosulfan	Diethyl phthalate	Methanol	Promecarb	Sulfide
Chlordane	p-Dimethylaminoazobenzene	Methapyrilene	Pronamide	Thallium
p-Chloroaniline	2,4-Dimethyl phenol	Methiocarb	Propapham	Vanadium
Chlorobenzene	Dimethyl phthalate	Methionyl	Propoxur	Zinc
Chlorobenzilate	Di-n-butyl phthalate	Methoxychlor	Prosulfocarb	
2-Chloro-1,3-butadiene	1,4-Dinitrobenzene	3-Methylcholanthrene	Pyrene	
Chlorodibromomethane	4,6-Dinitro-o-cresol	4,4-Methylene bis(2-chloroaniline)	Pyridine	
Chloroethane	2,4-Dinitrophenol	Dichloromethane	Safrole	
bis(2-Chloroethoxy)methane	2,4-Dinitrotoluene	MEK	2,4,5-TP	

SIC Code Industry

2812	Alkalies and chlorine production
2813	Industrial gases
2816	Inorganic pigments
2819	Industrial inorganic chemicals, not elsewhere classified
2821	Plastics Materials, Synthetic Resins, and Nonvulcanizable Elastomers
2822	Synthetic Rubber (Vulcanizable Elastomers)
2823	Cellulosic Manmade Fibers
2824	Manmade Organic Fibers, Except Cellulosic
2833	Medicinal Chemicals and Botanical Products
2834	Pharmaceutical Preparations
2835	In Vitro and In Vivo Diagnostic Substances
2836	Biological Products, Except Diagnostic Substances
2841	Soap and Other Detergents, Except Specialty Cleaners
2842	Specialty Cleaning, Polishing, and Sanitation Preparations
2843	Surface Active Agents, Finishing Agents, Sulfonated Oils, and Assistants
2844	Perfumes, Cosmetics, and Other Toilet Preparations
2851	Paints, Varnishes, Lacquers, Enamels, and Allied Products
2861	Gum and Wood Chemicals
2865	Cyclic Organic Crudes and Intermediates, and Organic Dyes and Pigments
2869	Industrial Organic Chemicals, Not Elsewhere Classified
2873	Nitrogenous Fertilizers
2874	Phosphatic Fertilizers
2875	Fertilizers, Mixing Only
2879	Pesticides and Agricultural Chemicals, Not Elsewhere Classified
2891	Adhesives and Sealants
2892	Explosives
2893	Printing Ink
2896	Carbon Black
2899	Chemicals and Chemical Preparations, Not Elsewhere Classified
2911	Petroleum refining
2999	Products of petroleum and coal, not elsewhere classified
3312	Steel Works, Blast Furnaces (Including Coke Ovens), and Rolling Mills
4953	Refuse Systems
4959	Sanitary Services, Not Elsewhere Classified
9511	Air and Water Resource and Solid Waste Management



TRADEBE
Environmental Services™

Attachment 2

Tradebe Environmental Group Informational Update
"Waste Profile Communication-The Exchange of Information"

Tradebe Treatment and Recycling, LLC

4343 Kennedy Avenue • East Chicago, IN 46312 • Phone: (800) 388-7242 • (219) 397-3951 • Fax: (219) 397-8411 • www.tradebe.com

Tradebe Treatment and Recycling LLC
is a division of the Tradebe
Environmental Services

Tradebe Treatment and Recycling, LLC

Environmental Group
Informational Update

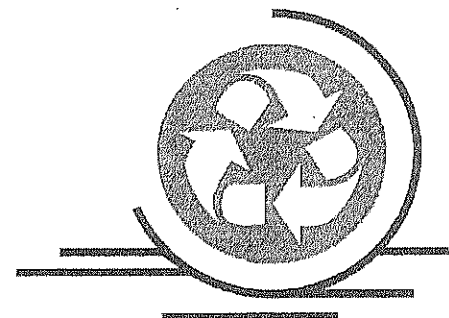
Tradebe Treatment and Recycling, LLC

4343 Kennedy Avenue
East Chicago, IN 46312
Phone: 219.397.3951
Fax: 219.397.6441



TRADEBE
Environmental Services™

For information on training seminars or to schedule a site specific training session, contact the Corporate Training Manager for Trade Environmental Services @ 219.397.3951.



From chemical waste
to reusable products.

"Waste Profile
Communication-The Exchange
of Information"

Waste Profile Communication – the exchange of information

Generators of waste are required to make a waste determination before completing environmental reporting and/or shipping their waste off-site. USEPA regulations contained in 40 CFR Parts 261 and 262 identify the actions that the generator or an authorized agent working on behalf of the generator must undertake to conduct the waste determination (e.g., hazardous, non-hazardous or excluded from the regulations). These actions can establish the framework for the generator's Environmental Health and Safety Compliance program. If a waste determination is conducted improperly, exposure to inherent safety and environmental liabilities and the potential enforcement actions is possible for all parties. Under certain situations the generator may be required to pay for site cleanup activities, as a result of an improper waste determination.

Getting started with profile completion, aside from general company information (name, address, EPA ID number for the location); the profile completion requires the assembly of information for the material(s) used in the process that creates the product and thus generates the waste. To begin the process of making a proper waste determination, first read USEPA's regulation, 40CFR 262.11 *Hazardous Waste Determination*, (regulations can be found at www2.epa.gov/laws-regulations).

Tradebe recommends gathering Safety Data Sheets (SDS) for each waste stream. The SDSs will help you determine your wastes chemical composition, please also take into account any water added to the process. Working with your technical staff you can develop an Input / Output flow chart to track both the hazardous and non-hazardous materials used in a process (inputs) and waste or effluents generated (outputs). Determining the Input / Output flow can help to identify the percentage of a chemical that is contained in the waste. Compare the Input / Output results to the regulations in 40 CFR 261, *Identification and Listing of Hazardous Waste*. Use of this information is known as **GENERATOR KNOWLEDGE**, a method of documented waste determination. NOTE: The Input / Output information will also help in the completion of other facility Environmental Reports, (i.e., TRI).

If a generator is unsure if an Input chemical could be found in the waste; is unsure of the concentration the Input chemical could be in the waste; or if the Input chemical could "Leach" out of the waste, then waste sampling and laboratory analysis is a more suitable action by the generator in conducting a Proper Waste Determination.

Waste determinations should not be taken lightly. Many generators have found out too late after a Regulatory Audit their waste was not properly characterized.

In other cases generators were alarmed to find out that their waste stream changed as a result of a chemical replacement made at the production process. **REMEMBER** any changes to your waste stream must be submitted to your environmental waste processor prior to shipment. For solvents, a generator must determine if a used solvent is a: spent solvent, F Listed waste; dirty solvent, D coded waste); or if other codes may apply, (i.e., Off-Specification Commercial Chemical Products).

Once the waste is classified other applicable EPA and DOT regulations can be identified for the waste profile completion; waste shipments and TSD processing.

Resources for generators – Please refer to the USEPA Websites,

[/www.epa.gov/wastes/hazard/generation/resources.htm](http://www.epa.gov/wastes/hazard/generation/resources.htm)

[/www.epa.gov/wastes/hazard/downloads/tool.pdf](http://www.epa.gov/wastes/hazard/downloads/tool.pdf)

Or contact your state agency for additional guidance.



TRADEBE
Environmental Services™

Attachment 3
Waste Shipment Check-off Sheet

Waste Shipment Check-off Sheet

Waste Determination (WD):

- WD-1 Has a proper waste determination been made per 40 CFR 261 and 262.11 regulations? _____
- WD-2 Is the waste: Non-EPA regulated, Hazardous, Universal waste, Medical Or Used Oil waste? _____
- WD-3 Was the waste determination made by Generator knowledge? _____
- WD-4 Was the waste determination made by waste analysis? _____
- WD-5 Is the documentation for waste determination at the facility and available for review? _____
- WD-6 Has anything in the waste generating process changed since the waste determination? _____
- WD-7 Has the waste determination information been provided to processing facility? _____
- WD-8 Has the processing facility approved the waste for processing? _____
- WD-9 Has the waste determination effected the Generator status for the facility? LQG, SQG, CESQG _____

Waste Containers Pre-shipment (WC) :

- WC-1 Are the waste containers in good condition (no integrity issues: dents, rust, leaking)? _____
- WC-2 Are the waste containers properly closed (ring bolt and or bungs tight, lid gasket in place)? _____
- WC-3 If regulated waste, are the waste containers properly labeled to EPA requirements? _____
- WC-4 If Hazardous waste, does the label include the:
 - Accumulation start date _____ EPA waste codes _____
 - DOT Proper shipping name _____
 - Generator Name and address _____
 - Generator EPA ID Number _____ Manifest number _____
- WC-5 Are the Waste containers properly marked to DOT requirements? _____
 - Are the DOT Primary and Subsidiary hazardous material classifications identified? _____
 - Are all DOT labels applied (primary, secondary) _____
 - Do waste containers require any DOT Special Permit information? _____
- WC-6 Has the receiving processing facility special markings been applied (if applicable)? _____

Waste Manifest (WM)

- WM-1 Manifest completion: Generator EPA ID #, Page # and Emergency number? _____
- WM-2 Generator information completed (name, address, telephone number)? _____
- WM-3 Transporter Information completed (name and EPA ID number)? _____
- WM-4 Receiving TSDF information completed: name, address, phone number and EPA ID number)? _____
- WM-5 Waste entries have proper DOT shipping names; container type and quantities shipped? _____
- WM-6 Are the waste codes (federal and state) identified? _____
- WM-6 Special Instructions, such as: ERG information, profile numbers or revised entries identified? _____
- WM-7 Name and Signatures:
 - Has a Generator representative printed, signed and dated the manifest? _____
 - Has the Transporter (truck driver) printed, signed and dated the manifest? _____

Land Disposal Restriction Notification (LDR)

(Must be completed and sent with initial waste shipment; some states require every shipment)

- LDR-1 Are ALL the applicable waste codes, AS identified on profile and manifest, identified-checked? _____
(Only 6 waste codes can listed on the manifest, LDR requires data on all applicable waste codes)
- LDR-2 Is the Treatability Group identified? _____
- LDR-3 Are the Subcategory/Constituents by Waste Codes identified (if applicable)? _____
- LDR-4 Are all the Underlying Hazardous Constituents identified (if applicable)? _____
- LDR-5 Has a copy of the completed LDR(s) been made and kept for the Generator's files? _____

With the activities conducted and verified as complete, remove the Generator copies from the signed manifest, confirm the truck is properly loaded, placarded and provide the driver the traveling copies of the manifest and other shipping documents, release the truck for transport.

Exhibit

G



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-2829
PAT QUINN, GOVERNOR LISA BONNETT, DIRECTOR

217-524-3300

October 10, 2013

CERTIFIED MAIL #
RETURN RECEIPT REQUESTED
7012 0470 0001 2972 2707

Tradebe Environmental Services
Attn: Tita LaGrimas
4343 Kennedy Avenue
East Chicago, Indiana 46312

Re: Notice of Non-Issuance of Compliance Commitment Agreement
Violation Notice: L-2013-01115
9180890023 – Lake County
Tradebe Treatment and Recycling, LLC
Compliance File

Dear Ms. LaGrimas:

The Illinois Environmental Protection Agency ("Illinois EPA") has reviewed the proposed Compliance Commitment Agreement ("CCA") terms submitted by Tradebe Treatment and Recycling, LLC in a letter dated September 12, 2013, in response to the Violation Notice dated May 28, 2013 and the meeting held on August 29, 2013, and has decided not to issue a proposed CCA for these violations. Due to the nature and seriousness of the violations, the Illinois EPA has determined that these violations may not be able to be resolved without the involvement of the Office of the Attorney General or the United States Environmental Protection Agency.

Because the violations remain the subject of disagreement between the Illinois EPA and Tradebe Treatment and Recycling, LLC, this matter will be considered for referral to the above-referenced prosecutorial authorities for formal enforcement action and the imposition of penalties.

Written communications should be directed to:

Illinois EPA – Bureau of Land
Attn: Paul Purselove
1021 North Grand Avenue East
P.O. Box 19276
Springfield, Illinois 62794-9276

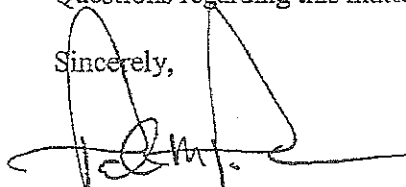
Please include the Violation Notice Number L-2013-01115 and the Site Identification Number 9180890026 on all written communications.

4302 N. Main St., Rockford, IL 61103 (815)987-7760
595 S. State, Elgin, IL 60123 (847)608-3131
2125 S. First St., Champaign, IL 61820 (217)278-5800
2009 Mall St., Collinsville, IL 62234 (618)346-5120

9511 Harrison St., Des Plaines, IL 60016 (847)294-4000
5407 N. University St., Arbor 113, Peoria, IL 61614 (309)693-5462
2309 W. Main St., Suite 116, Marion, IL 62959 (618)993-7200
100 W. Randolph, Suite 10-300, Chicago, IL 60601 (312)814-6026

Questions regarding this matter should be directed to Calvin Harris at 847/294-4080.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. M. Purseglove', with a long horizontal line extending to the right.

Paul M. Purseglove, Manager
Field Operations Section
Bureau of Land

bcc: Calvin Harris – Des Plaines Regional Office
Illinois EPA DLC Contact(s)
Illinois EPA Bureau Records Unit

Non Issued

U.S. Postal Service™
CERTIFIED MAIL™ RECEIPT
 (Domestic Mail Only, No Insurance Coverage Provided)
 For delivery information, visit our website at www.usps.com

OFFICIAL USE

Postage \$
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 Restricted Delivery Fee (Endorsement Required)
 Total Postage & Fees \$

SPRINGFIELD IL
 OCT 3 2013
 USPS 62703

Sent, 9180890027 - Lake County
 Non-Issuance of CCA for VN L-2013-01115
 Tradebe Environmental Services
 Attn: Tita LaGrimas
 4343 Kennedy Avenue
 East Chicago, IL 46312

PSR

EPA - DIVISION OF RECORDS MANAGEMENT
 RELEASABLE

NOV 04 2013

REVIEWER MED

PMP/BOL/EOS #24

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece or on the front if space permits.

1. Article Addressed to:

9180890027 - Lake County
 Non-Issuance of CCA for VN L-2013-01115
 Tradebe Environmental Services
 Attn: Tita LaGrimas
 4343 Kennedy Avenue
 East Chicago, IL 46312

2. Article Number
 (Transfer from service label)

7012 0470 0001 2972 2707

COMPLETE THIS SECTION ON DELIVERY

A. Signature *Christie L Olson* ☐ Agent ☐ Addressee

B. Received by (Printed Name) *CHRISTIE OLSON* C. Date of Delivery *10-15-13*

D. Is delivery address different from item 1? ☐ Yes ☐ No
 If YES, enter delivery address below:

3. Service Type
☒ Certified Mail ☐ Express Mail
☐ Registered ☐ Return Receipt for Merchandise
☐ Insured Mail ☐ C.O.D.

4. Restricted Delivery? (Extra Fee) ☐ Yes

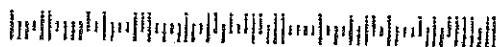
UNITED STATES POSTAL SERVICE



First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4 in this box •

Illinois Environmental Protection Agency,
BOL #24
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276



Exhibit

H

Westlaw

25651628717

Page 1

Corporate Records & Business Registrations**Source Information**

This Record Last Updated: 08/17/2013
Database Last Updated: 12/03/2013
Update Frequency: DAILY
Current Date: 12/03/2013
Source: AS REPORTED BY THE SECRETARY OF STATE OR OTHER
OFFICIAL SOURCE

Company Information

Name: TRADEBE TREATMENT AND RECYCLING, LLC
Address: 1301 W. 22ND STREET, SUITE 500
OAK BROOK, IL 60523

D&B DUNS: 85-938-5254

Filing Information

Identification Number: 03458334
Filing Date: 03/08/2011
State of Incorporation: DELAWARE
Status: GOOD STANDING
Status Attained Date: 02/25/2013
Business Type: LIMITED LIABILITY COMPANY
Address Type: MAILING
Where Filed: SECRETARY OF STATE/LIMITED LIABILITY COMPANY DI-
VISION
STATE HOUSE RM 213 FL 2
SPRINGFIELD, IL 62756

Registered Agent Information

Name: STEVEN JAY KATZ
Address: 1925 TURTLE BAY
VERNON HILLS, IL 60061
Appointed Date: 03/08/2011

25651628717

Page 2

Principal Information

Name: QUINTANILLA, ALBERTO DIEZ
Title: MANAGER
Address: 1301 W. 22ND STREET, SUITE 500
OAK BROOK, IL 60523

Name: KOLODNY, SERGIO NUSIMOVICH
Title: MANAGER
Address: 1301 W. 22ND STREET, SUITE 500
OAK BROOK, IL 60523

Tax Information

Corporate Tax Details:
Annual Report Filed: 02/25/2013

Additional Detail Information

Additional Details: LATEST DATE TO DISSOLVE: 99/99/9999. MANAGEMENT
TYPE: MANAGER MANAGED

The preceding public record data is for information purposes only and is not the official record. Certified copies can only be obtained from the official source.

The public record items reported above may have been paid, terminated, vacated or released prior to today's date.

Order Documents

Call Westlaw CourtExpress at 1-877-DOC-RETR (1-877-362-7387)
for on-site manual retrieval of documents related to this or other matters.
Additional charges apply.

END OF DOCUMENT

Exhibit

I



Decide with Confidence

TRADEBE ENVIRONMENTAL SERVICES, LLC

D-U-N-S® 96-620-8204

Headquarters(Subsidiary)
1301 W 22nd St Ste 500,
Oak Brook, IL 60523
Website:
www.tradebeusa.com

Phone 219 354-2369
Fax 219-397-6411

Business Information Report

Purchase Date: 12/04/2013
Last Update Date: 07/12/2013
Attention: Mark Gurnik

Executive Summary**Company Info**

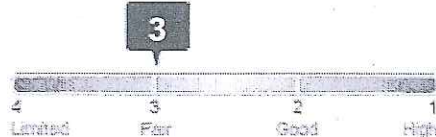
Year Started	1986	Employees Here	1 at this location
Control Year	1986	Do not confuse with	other related companies at the same address
Employees	438	Trade Styles	(SUBSIDIARY OF TRADEBE GP, EAST CHICAGO, IN)

D&B Rating

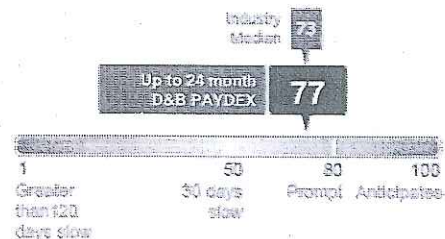
D&B Rating

1R3

Composite Credit Appraisal

**D&B PAYDEX®**

Up to 24 month D&B PAYDEX



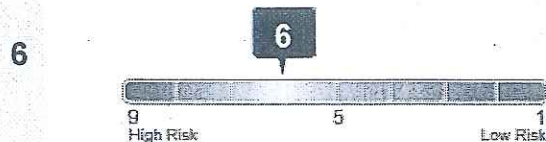
Up to 3 month D&B PAYDEX

**D&B Viability Rating**

D&B Viability Rating

6**8****B****Z**

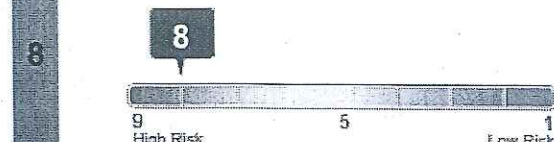
Viability Score



Data Depth Indicator



Portfolio Comparison



Company Profile





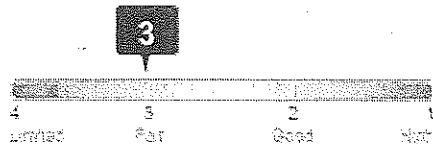
Decide with Confidence

Business Information**Business Summary**

SIC 4953
Refuse
systems/repair
services/oil/gas
field services and
recycling

NAICS 562211
Hazardous Waste
Treatment and
Disposal

History Status CLEAR

Credit Capacity Summary**D&B Rating****1R3****Composite Credit Appraisal**

Prior D&B Rating 1R3

Rating Date 12/17/2012

Payment Activity (based on 18 experiences) USD

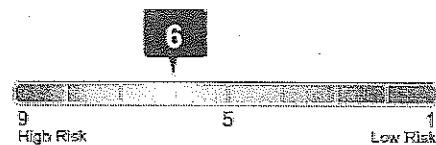
Average High Credit \$6,296

Highest Credit 25,000

Total Highest Credit 94,600

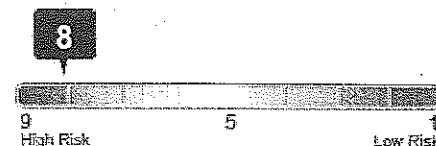
D&B Viability Rating

The D&B Viability Rating uses D&B's proprietary analytics to compare the most predictive business risk indicators and deliver a highly reliable assessment of the probability that a company will no longer be in business within the next 12 months.

6**Viability Score**

Compared to All US Businesses within D&B Database:

- Level of risk: Moderate Risk
- Businesses ranked 6 have a probability of becoming no longer viable: 13%
- Percentage of businesses ranked 6: 30%
- Across all US businesses, the average probability of becoming no longer viable: 14%

8**Portfolio Comparison**

Compared to all Businesses within the same MODEL SEGMENT:

Model Segment: Established Trade Payments

- Level of risk: High Risk
- Businesses ranked 8 within this model segment have a probability of becoming no longer viable: 11%
- Percentage of businesses ranked 8 within this model segment: 13%
- Within this model segment, the average probability of becoming no longer viable: 5%

B**Data Depth Indicator**



Decide with Confidence

B

Data Depth Indicator

Data Depth Indicator Details:

- ✓ Rich Firmographics
- ✓ Extensive Commercial Trading Activity
- ✓ Basic Financial Attributes

Greater data depth can increase the precision of the D&B Viability Rating assessment.

You have the ability to influence the confidence of the viability assessment by asking the business to report more information to D&B at <https://iupdate.dnb.com/iUpdate/>

G

Descriptive

B

A
Predictive

Z

Company Profile

Subsidiary

Business History

Officers

ALBERTO DIEZ, CEO;
SERGIO NUSIMOVICH, PRES-COO

As of 07/12/2013

The Delaware Secretary of State's business registrations file showed that Tradebe Environmental Services, LLC was registered as a Limited Liability Company on March 10, 2011.

Business started 1986 by the ultimate parent company.

The parent company has a 100% ownership interest in this entity.

ALBERTO DIEZ. Antecedents are undetermined.

Business address has changed from 4343 Kennedy Ave, East Chicago, IN, 46312 to 1301 W 22nd St Ste 500, Oak Brook, IL, 60523.

Government Activity Summary

Activity Summary

Possible candidate for socioeconomic program consideration

Borrower	No	Labor Surplus Area	YES (2013)
Administrative Debt	No	Small Business	N/A
Grantee	No	Women Owned	N/A
Party Excluded from Federal Programs	No	Minority Owned	N/A
Public Company	N/A		
Contractor	No		
Importer/Exporter	N/A		

The details provided in the Government Activity section are as reported to Dun & Bradstreet by the federal government and other sources.

Operations Data

As of 07/12/2013

Description:

Subsidiary of TRADEBE GP, EAST CHICAGO, IN which operates as a holding company.

As noted, this company is a subsidiary of Tradebe GP, DUNS number 02-022-1619 and reference is made to that report for information about the parent company and its management.



Decide with Confidence

Holding company which through its wholly owned subsidiaries operates as a refuse system, provides tank cleaning and oil/gas field services and operates a recycling facility.

Terms are undetermined.

Employees: 438 which includes partners. 1 employed here.

Facilities: Occupies premises in a building.

Special Events

As of 06/27/2013

Business address has changed from 4343 Kennedy Ave, East Chicago, IN, 46312 to 1301 W 22nd St Ste 500, Oak Brook, IL, 60523.

Industry Data

SIC

Code	Description
49530100	Hazardous waste collection and disposal
49539905	Recycling, waste materials
76990605	Ship boiler and tank cleaning and repair, contractors
76990503	Industrial equipment cleaning
13890105	Lease tanks, oil field: erecting, cleaning, and repairing

NAICS

Code	Description
562211	Hazardous Waste Treatment and Disposal
562920	Materials Recovery Facilities
811310	Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance
811310	Commercial and Industrial Machinery and Equipment (except Automotive and Electronic) Repair and Maintenance
213112	Support Activities for Oil and Gas Field Operations

Family Tree

Parent

TRADEBE GP
(D-U-N-S®:02-022-1619)
4343 KENNEDY AVE,
EAST CHICAGO, IN 46312-
2723

Global Ultimate

GRUPO TRADEBE MEDIO
AMBIENTE SOCIEDAD
LIMITADA;
(D-U-N-S®:54-083-0424)
CALLE PUNTA SOLLANA 12,
ZIERBENA, 48508,
ES

Subsidiaries Domestic

TRADEBE INDUSTRIAL SERVICES, LLC; (D-U-N-S®:00-318- 9966) 4343 KENNEDY AVE, EAST CHICAGO, IN 46312-2723	NORLITE CORPORATION (D-U-N-S®:06-991- 9934) AKA: NORLITE 628 SARATOGA ST, COHOES, NY 12047- 4644	TRADEBE TREATMENT AND RECYCLING, LLC; (D-U-N-S®:85-938- 5254) 4343 KENNEDY AVE, EAST CHICAGO, IN 46312-2723	TRADEBE ONSITE SERVICES, LLC; (D-U-N-S®:82-371- 8655) 4343 KENNEDY AVE, EAST CHICAGO, IN 46312-2723	TRADEBE TREATMENT AND RECYCLING OF TENNESSEE, LLC; (D-U-N-S®:96-628- 7216) 5485 VICTORY LN, MILLINGTON, TN 38053-8325
--	---	--	---	---

Affiliates Domestic

TRADEBE
TREATMENT AND
RECYCLING LLC;
(D-U-N-S®:01-361-
3586)
4343 KENNEDY AVE,
EAST CHICAGO, IN
46312-2723

This list is limited to the first 25 branches, subsidiaries, divisions and affiliates, both domestic and international. Please use the Global Family Linkage Link above to view the full listing.

Financial Statements



Decide with Confidence

Key Business Ratios (Based on 14 establishments)

D&B has been unable to obtain sufficient financial information from this company to calculate business ratios. Our check of additional outside sources also found no information available on its financial performance. To help you in this instance, ratios for other firms in the same industry are provided below to support your analysis of this business.

	This Business	Industry Median	Industry Quartile
Profitability			
Return on Sales	UN	7.1	UN
Return on Net Worth	UN	8.5	UN
Short Term Solvency			
Current Ratio	UN	1.7	UN
Quick Ratio	UN	1.0	UN
Efficiency			
Assets Sales	UN	185.4	UN
Sales / Net Working Capital	UN	5.0	UN
Utilization			
Total Liabs / Net Worth	UN	111.5	UN

Most Recent Financial Statement

As of 02/14/2013

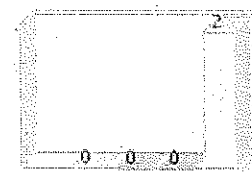
As of February 14, 2013, attempts to contact the management of this business have been unsuccessful. Inside and outside sources confirmed operation and location.

Dun & Bradstreet's usual practice is not to Rate a Subsidiary higher than its Parent. The Tangible Net Worth and financial condition of the Parent have been used as one factor in rating this business. A copy of the report on the Parent is available if further information is required.

Indicators**Public Filings Summary**

The following data includes both open and closed filings found in D&B's database on this company

Record Type	No. of Records	Most Recent Filing Date
Judgment	0	
Lien	0	
Suit	0	
UCC	2	04/18/2011

Public Filings

☒ Bankruptcy ☒ Judgment ☒ Lien ☒ Suit ☒ UCC

The following Public Filing data is for information purposes only and is not the official record. Certified copies can only be obtained from the official source.

Full Filings**UCC Filings**

Collateral	All Assets	Latest Info Received	02/04/2011
Filing No.	2011 0119969	Type	Original
Where Filed	SECRETARY OF STATE/UCC DIVISION, DOVER, DE		



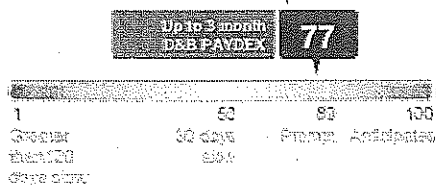
Decide with Confidence

Secured Party	RBS CITIZENS, NATIONAL ASSOCIATION, A NATIONAL BANKING ASSOCIATION, CHICAGO, IL	Date Filed	01/11/2011
Debtor	TRADEBE ENVIRONMENTAL SERVICES, LLC		
Filing No.	2011 1447401	Latest Info Received	05/11/2011
Original UCC Filed Date	01/11/2011	Type	Amendment
Where Filed	SECRETARY OF STATE/UCC DIVISION, DOVER, DE	Date Filed	04/18/2011
Secured Party	RBS CITIZENS NATIONAL ASSOCIATION, AS ADMINISTRATIVE AGENT, CHICAGO, IL RBS CITIZENS, NATIONAL ASSOCIATION, A NATIONAL BANKING ASSOCIATION, CHICAGO, IL	Original Filing No.	2011 0119969
Debtor	TRADEBE ENVIRONMENTAL SERVICES, LLC		

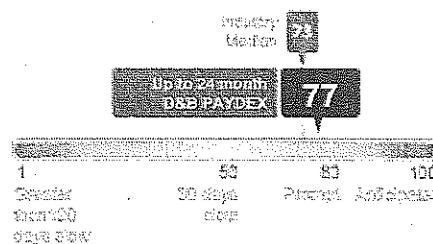
The public record items contained in this report may have been paid, terminated, vacated or released prior to the date this report was printed.
Additional UCC and SLJ filings for this company can be found by conducting a more detailed search in our Public Records Database.

Paydex**D&B PAYDEX®**

Shows the D&B PAYDEX scores as calculated up to 3 months and up to 24 months of payment experiences.

Up to 3 month D&B PAYDEX

When weighted by dollar amount, payments to suppliers average 5 Days Beyond Terms. Based on payments collected over last 3 months.

Up to 24 month D&B PAYDEX

When weighted by dollar amount, payments to suppliers average 5 days beyond terms. Based on payments collected up to 24 months.

When weighted by dollar amount, the industry average is 11 DAYS BEYOND terms.

High risk of late payment (average 30 to 120 days beyond terms)

Medium risk of late payment (average 30 days or less beyond terms)

Low risk of late payment (average prompt to 30+ days sooner)

Payment Trend	unchanged *	Total Payment Experiences for the HQ	18	Highest Now Owning	\$20,000
Payments Within Terms	82%	Total Placed for Collection	0	Highest Past Due	\$2,500
Average High Credit	\$6,296	Largest High Credit	\$25,000		

* compared to payments three months ago

Payment Summary

The Payment Summary section reflects payment information in D&B's file as of the date of this report.

There are 18 payment experiences in D&B's file, with 12 experiences reported during the last three month period. The highest Now Owes on file is \$20,000. The highest Past Due on file is \$2,500.

Top 10 Industries

Industries	Total Received	Total Amounts	Largest High Credit	Within Terms (%)	Days Slow (%)			
					0-30	31-60	61-90	90+
Telephone communictns	5	\$37,000	\$25,000	100	0	0	0	0
Whol misc profsn eqpt	2	16,000	15,000	94	3	0	3	0
Nonclassified	1	20,000	20,000	100	0	0	0	0



Decide with Confidence

Short-term busn credit	1	10,000	10,000	50	50	0	0	0
Whol chemicals	1	7,500	7,500	50	0	0	50	0
Radiotelephone commun	1	2,500	2,500	100	0	0	0	0
Reg misc coml sector	1	1,000	1,000	100	0	0	0	0
Detective/guard svcs	1	250	250	50	0	0	50	0
Whol electrical equip	1	100	100	100	0	0	0	0
Whol office supplies	1	100	100	100	0	0	0	0

Other Payment Categories

Category	Total Received	Total Dollar Amounts	Largest High Credit
Cash Experiences	3	\$150	\$50
Payment record unknown	0	0	0
Unfavorable comments	0	0	0
Placed for Collection	0	0	0

Detailed Payment History

Date Reported	Paying Record	High Credit	Now Owes	Past Due	Selling Terms	Last Sale within(months)
October 2013	Ppt	\$25,000	\$7,500	\$0	N/A	1
	Ppt	20,000	20,000	0	N/A	1
	Ppt	5,000	1,000	0	N/A	1
	Ppt	5,000	5,000	0	N/A	1
	Ppt	1,000	750	0	N/A	1
	Ppt	1,000	1,000	0	N/A	1
	Ppt	100	0	0	N30	6-12
	Ppt-Slow 15	10,000	0	0	N/A	2-3
	Ppt-Slow 90	7,500	0	0	N/A	6-12
September 2013	Ppt	15,000	15,000	2,500	N30	1
	Ppt	100	0	0	N30	1
	Ppt-Slow 90	250	0	0	N/A	6-12
July 2013	Slow 30-90	1,000	0	0	N/A	6-12
May 2013	(014)	50	0	0	Cash account	2-3
	(015)	50	0	0	Cash account	2-3
February 2012	Ppt	2,500	0	0	N/A	6-12
	(017)	50	0	0	Cash account	1
January 2012	(018)Satisfactory	1,000	0	0	N/A	6-12

Lines shown in red are 30 or more days beyond terms

Payment experiences reflect how bills are met in relation to the terms granted. In some instances payment beyond terms can be the result of disputes over merchandise, skipped invoices etc.

Each experience shown is from a separate supplier. Updated trade experiences replace those previously reported.

Exhibit

J

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MISSION STATEMENT

Protecting the earth through sound waste management has been the focal point of our business since 1986. Every step we take, every innovation we pioneer, every resource we recycle, reduces greenhouse gasses and lowers carbon footprints for our customers nationwide. Superior waste management has never been more important, it is our path, our commitment and our promise to the future.

[Read What We Do](#)

TRADEBE Environmental Services, LLC

has unique programs and patented technology to recycle hazardous chemicals. We recycle over 60% of the waste we process.

CORPORATE TRADEBE NEWS

[Recent News from Tradebe](#)

BUY CHEMICALS

Purchase reclaimed chemicals for your industrial application to be used in place of virgin chemicals.

SELL CHEMICALS

Sell chemicals instead of disposing of them as waste. Prices based on recurring quantities and composition.

VOP 2013

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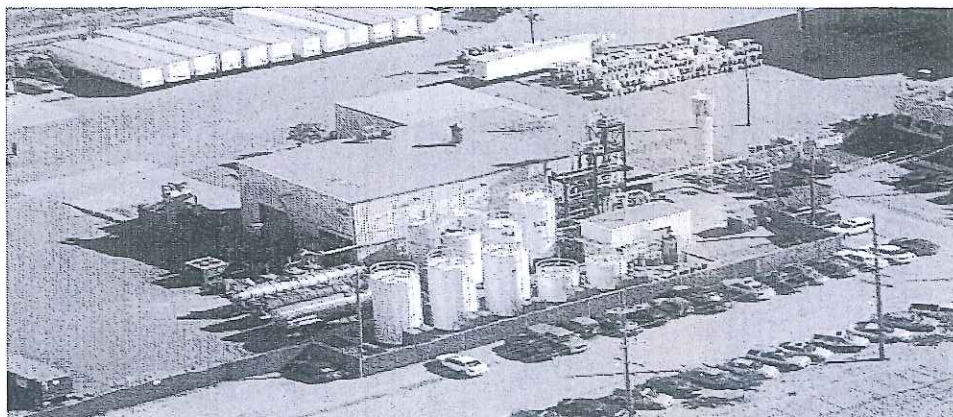


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III. Company Overview

A. The Indiana Facility

TRADEBE Treatment and Recycling, LLC (Formerly known as Pollution Control Industries) began operations at the East Chicago, Indiana facility in 1986. The facility's property sits on approximately 11 acres in a heavy industrial section of East Chicago and is approximately 20 miles south of downtown Chicago, Illinois. TRADEBE's neighbors include a commercial gas manufacturer, a rail-yard, and a vacant aluminum smelting facility. The closest water stream is the Indiana Harbor Canal, which is approximately 2,700 feet west of the facility. The facility is not located within a one hundred-year flood plain. The majority of the property is dedicated to serving TRADEBE's waste management operations. Also located on the facility's property is a rail-line that accommodates up to ten rail cars. The Elgin, Joliet and Eastern Rail Company serve TRADEBE's rail operation. The facility has no known site contamination. The facility has storage capacity for up to 11,000 "55 gallon drum equivalent" containers of hazardous waste. TRADEBE's operation includes a 164,714 gallon tank farm, a newly redesigned state-of-the-art lab pack/de-pack facility, a drum consolidation and handling building, recycling units and a non-hazardous processing building with 45,327 gallons of bulk treatment capacity.



In July of 2004, a significant new capability was added to its range of services called SDS or Solid Distillation System. Before SDS the materials processed through TRADEBE's facilities had to be sent off site for final treatment or disposal. Now SDS allows TRADEBE to process and recycle waste materials on site. The process is unique because unlike other thermal processes, the material never contacts the heat source. It is baked rather than burned and the baking drives off volatile and semi-volatile organics that are reclaimed and recycled. IDEM acknowledges the SDS as a recycling process, therefore all materials it processes receives a Certificate of Recycling. TRADEBE also operate three Liquid Distillation Units.

TRADEBE's main customer service and some administrative functions are managed from the East Chicago location. The East Chicago and Memphis facilities, as well as the company's satellite offices, are connected with a computer network and state-of-the-art inventory management system to streamline communications for customer service, waste movement and waste management operations. TRADEBE has developed specific programs to meet the operations' growing needs. The programs also support the administrative and the regulatory conditions needed to accommodate

a changing and every more demanding regulated industry. Personnel are fully supported with computer-based programs that enhance their departmental responsibility to the operations. Customer information, profiles and shipping documents are entered into the computer system to generate TRADEBE's operating records.

B. The Tennessee Facility



In April 1998, **TRADEBE Treatment and Recycling of Tennessee, LLC** (formerly known as Pollution Control Industries of Tennessee) commenced operations in Millington, Tennessee. The 36 acre facility was purchased from Waste Management. The operations and administrative buildings on the site were constructed in 1993. The developed portion of the facility served primarily as a transfer station for Chemical Waste Management. Based on a Phase I and Phase II audit conducted prior to transfer to TRADEBE, the site has no known environmental contamination.

The Tennessee's Part B Permit was renewed for 10 years in October 2010. The facility is regulated by the Tennessee Department of Environment and Conservation (TDEC) and is zoned for heavy industry. TRADEBE is permitted to store up to 9,748 "55-gallon drum equivalents" on site.

The Memphis permit operational capacities allow this site to accept and process the same types and similar quantities of waste that are handled at the East Chicago, Indiana facility. The Memphis facility operations include a single stage shredding tower capable of handling 450 drums per day of hazardous waste, an 80,000 gallon tank farm, a stabilization process for hazardous wastes and a solidification process for non hazardous wastes. In addition to processing areas, the Memphis facility features a well equipped laboratory, receiving and loading docks, and buildings for indoor storage.

C. The Meriden, CT Facility

In April 2011, Tradebe Environmental Services, LLC acquired United Industrial Services, with facilities in New England and the state of New York. The Meriden, CT facility sits on 2.5 acres and has been treating and storing used oil, hazardous waste, hazardous and non-hazardous waste water and containerized solid and liquid wastes since 1976. Up until 1976, the property was used as a commercial greenhouse and florist shop, as well as residence for the owners. In 1976, the owners began transporting, storing and burning waste oil. The waste oil was burned in the on-site boiler to heat the greenhouses. The owners formed United Waste Oil Company and began transporting and

storing waste oil for the other town businesses. The company grew to the point where wastewater treatment was brought on-site and waste oils classified as hazardous waste codes were being accepted. The facility filed its first RCRA Part A application in 1980. United received its first RCRA Part B permit in September 1995. The greenhouse and florist business was terminated in 1988.

D. The Bridgeport, CT Facility

The Bridgeport facility sits on 3.5 acres and has been treating and storing used oil, hazardous waste fuels, hazardous and non-hazardous wastewater and containerized liquid and solid waste since 1993. This facility operates a non-hazardous mix pit where solids and semi-solids can be solidified with materials such as sawdust and then transferred to a roll-off. Several types of waste streams are stored and treated in Bridgeport. Waste streams that are not treatable on-site are transported to a facility that can manage them.

E. The Stoughton, MA Facility

This Facility is centrally located in Stoughton, MA about 25 miles east of Boston, MA and sits on 2.5 acres. This facility is a RCRA Part B facility and holds an MWRA Wastewater Discharge Permit. The total tank storage capacity is 221,279 gallons, and had both drum and bulk liquid off-loading and storage capabilities.

F. The Northborough, MA Facility

The Northborough facility has a RCRA Part B permit, however, it is currently and idle facility.

G. The Cohoes, NY Facility – Norlite, a subsidiary of Tradebe Treatment and Recycling, LLC

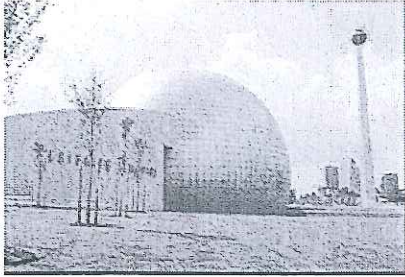
Mother Nature determined Norlite's location by depositing an easily accessible stratum of high quality shale on this location, approximately 450 million years ago. Known as Snake River Shale, Norlite's portion of this deposit is approximately 100 acres of pure shale, devoid of sandstone, quartz of lime. When heated, this shale uniformly expands to produce a high quality lightweight aggregate. Expanded shale from this deposit is in high demand by the construction industry based upon its strength, low bulk density and uniformity.



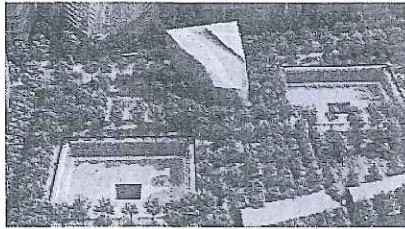
Norlite also stores and treats organic hazardous waste on this site, using solvent, chemical and oil wastes as low grade fuel (LGF) for the production of light weight aggregate in two dry process rotary kilns. Each kiln is fired with natural gas, oil, or low grade fuel. The air pollution control system on each kiln is comprised of four primary components – Multiple Stage Cyclone; Heat Exchanger; Fabric Filter Media Baghouse; Wet Scrubber.

The neighboring areas for Norlite consist of residential areas to the north and east, light commercial directly south with vacant land to the south and west of the facility. The buffer zone from the site's property lines to the operation areas varies from 500 feet to 1 mile.

Examples of construction applications for Norlite include:



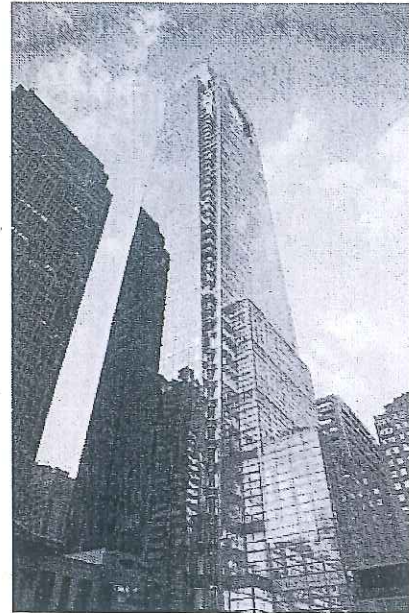
Building material for the Basketball Hall of Fame



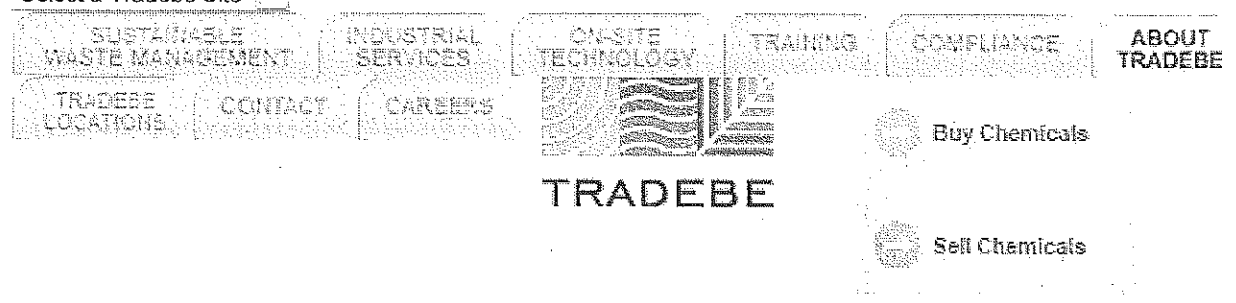
Planting media for the World Trade Center Memorial in NYC



Building material for the Triborough Bridge



Construction material for the Comcast Building

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At TRADEBE, we work internationally to offer quality, innovative environmental services that contribute to sustainable development and provide value to our customers, shareholders and personnel.

Tradebe - Sustainability at Work

At Tradebe, we create cost-effective ways for our clients to recycle hazardous waste. Our priority is recycling industrial waste into beneficial products and substitute fuels. To further our vision for the future, we created Tradebe Environmental Services through the acquisition of several well-established environmental services companies in North America. Tradebe sets the industry standard by recycling approximately 60% of the waste we process. We accomplish this through the use of "Green" Technology.

Tradebe Treatment and Recycling, LLC

Tradebe offers waste management, recycling and treatment services through our division, Tradebe Treatment and Recycling, LLC. Tradebe has multiple TSD facilities throughout the United States. We continue to increase our strategic nationwide coverage through the development and acquisition of waste transfer facilities.

Tradebe's unique programs and patented technology positions our company as an industry leader in waste recycling and reuse. Examples include:

- Tradebe's Chemical Reuse Program redirects qualified manufacturing by-products away from traditional waste disposal to manufacturers that do not require virgin chemicals.
- Tradebe's patented Solid Distillation System (SDS) recycles contaminated organic solid material by extracting the organic constituents to create an industrial product.
- Our specialized Distillation Technologies transforms waste solvents into usable products.

Tradebe Treatment and Recycling has a wide range of sustainable waste management services to handle all of our customers' waste management needs.

Tradebe Industrial Services, LLC

Tradebe Industrial Services, LLC has an experienced staff and advanced technology to provide a safe and efficient environment for industrial projects. Our highly trained crews are prepared perform a wide range of industrial services, some of which include: Site Evaluations & Remediation, Tank Services, Vacuum Services, Ductwork and Mechanical System Cleaning, Hydro blasting, Regional Emergency Response, and Waste Management and Consulting.

Tradebe provides a wide range of tank cleaning service levels and capabilities scaled to fit each of our customers' needs. Serving numerous industries, municipalities and utility companies, we are equipped to handle a broad range of cleaning from residential oil tanks to six million gallon refinery tanks. Patented remote-tank cleaning technology provides increased project safety to personnel and the environment while simultaneously reducing the disruption to our client's production time. In addition, we also have regional crews to assist our small to medium sized customers with Aboveground Storage Tanks (AST) and Underground Storage Tanks (UST) cleaning, maintenance, removal and inspection.

Tradebe Onsite Services, LLC

Tradebe Onsite Services, LLC can design, build, operate and maintain long term services for refineries, petrochemical and chemical plants to manage waste and secondary by-products, such as oily slops, oily sludge and slurry oil. Our experienced engineers collaborate with our clients to identify and design the ideal technology to recycle and reuse manufacturing by-products. Tradebe skilled Field Crews build and operate the equipment on a daily basis to ensure safe and optimal performance.

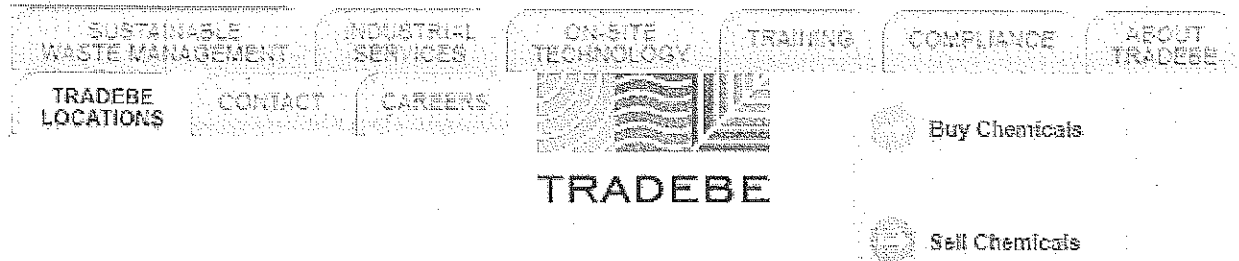
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Map Icon Legend

-  USA Headquarters
-  Treatment, Disposal, Storage Facility (TSDf)
-  10 Day Service Center

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Brown, Todd

From: Cuerington, Gaye
Sent: Tuesday, February 24, 2015 3:22 PM
To: Brown, Todd
Subject: RE: Tradebe Referral Denial Letter

Looks fine.

From: Brown, Todd
Sent: Tuesday, February 24, 2015 3:05 PM
To: Cuerington, Gaye
Subject: FW: Tradebe Referral Denial Letter

Hi Gaye,

Any comments on this letter before I print.

From: Cunningham, Michael
Sent: Tuesday, February 24, 2015 12:36 PM
To: Brown, Todd
Subject: RE: Tradebe Referral Denial Letter

Hi Todd,

Looks good... just a couple of minor changes. Go ahead and send to Gaye.

Then let's see what Gary thinks.

Thanks!

Mike C.

From: Brown, Todd
Sent: Tuesday, February 24, 2015 12:00 PM
To: Cunningham, Michael
Cc: Bourgikos, Spiros
Subject: Tradebe Referral Denial Letter

Mike,

Attached is a draft of the referral denial letter to IEPA regarding Tradebe in Indiana for your review.

Also, from RCRAInfo, it does appear that IEPA is taking action against the generator, so I think the matter can be closed as soon as we issue this letter.

Finally, IEPA appears to have recorded its NOV to Tradebe in RCRAInfo. However, I do not see a SNY or referral in RCRAInfo from Illinois, so therefore, I don't think there is anything for us to clean up with respect to that.

Todd Brown
EPA
(312) 886-6091